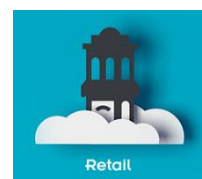


Aro Underwriting Group Limited



Privacy Notice



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Aro Underwriting

Aro Underwriting Group is a fully approved Lloyd’s cover holder with Lloyd’s and UK Company Capacity for various Commercial products. Our products are supported by a panel of ‘A’ rated Insurers, across Commercial (Commercial Combined, Property, Liability); Package (Office, Retail, Tradesmen); and Property Owners (Residential Landlord, Blocks of Flats, Commercial Property Owners).

The Aro Underwriting website is operated by ARO Underwriting Group Limited. (Referred as “Aro”, “we”, “our”, “us” in this, Privacy Notice).

ARO Underwriting Group Limited is a private limited company registered in England and Wales under company number 07491066 and we have our registered office at Sackville House, 55 Buckhurst Avenue, Sevenoaks, Kent, TN13 1LZ.

We are registered with the Information Commissioner’s Office (the ICO) with registration number Z3063030.

We are regulated by the Financial Conduct Authority under firm reference number 505452.

We have therefore developed this privacy notice to inform you of the data we collect, what we do with your information, what we do to keep it secure as well as the rights and choices you have over your personal information.

Throughout this policy we refer to Data Protection Legislation which means the Data Protection Act 2018 (DPA2018), United Kingdom General Data Protection Regulation (UK GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the aforementioned legislation. Where data is processed by a controller or processor established in the European Union or comprises the data of people in the European Union, it also includes the EU General Data Protection Regulation (EU GDPR). This includes any replacement legislation coming into effect from time to time.

What Personal Data do we Collect and When?

Insurance underwriting and claims information is collected either directly from you or from other participants in the insurance market which are engaged in your insurance arrangements.

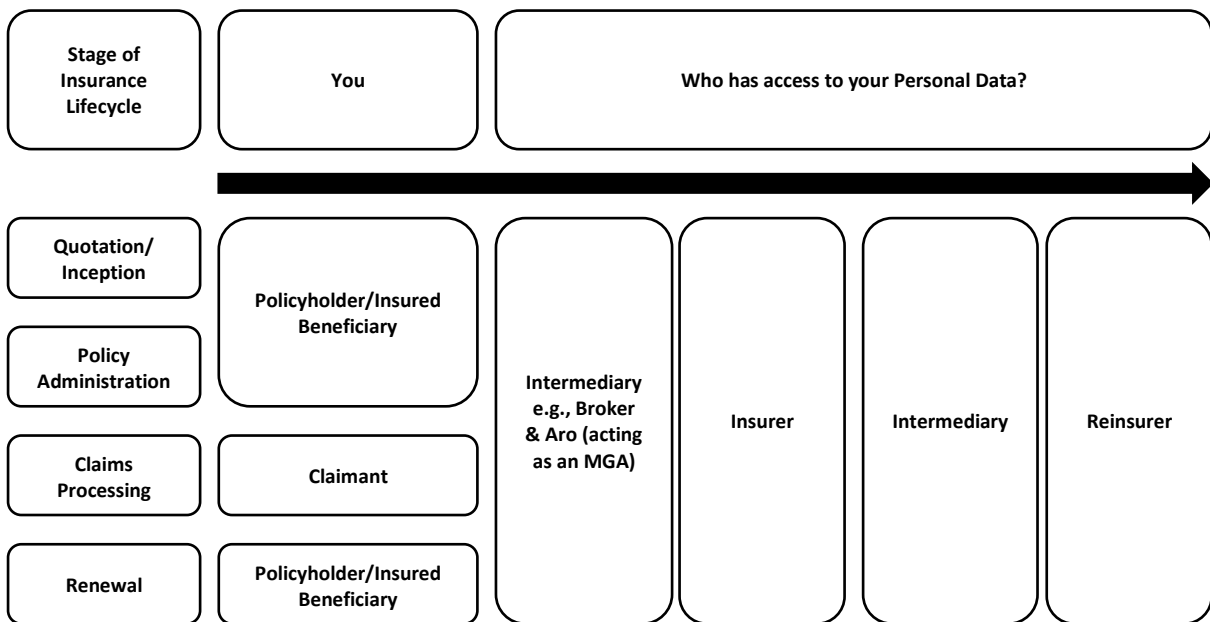
The insurance market contains several participants including, but not limited to, intermediaries (brokers, agents, cover holders, MGAs) as well as insurers and reinsurers. For the market and the individual members to function there needs to be a sharing of information and data.

For us to provide insurance quotes, insurance policies, and/or deal with any claims or complaints, we need to collect and process personal data about you. The types of personal data that are processed may include:

<i>Categories of Personal Data</i>	Details
<i>Contact Details</i>	Name, address (including proof of address), email and telephone numbers, gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you
<i>Identification details</i>	Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving licence number

<i>Financial Information</i>	Bank account or payment card details, income, or other financial information
<i>Risk Details</i>	Information about you which we need to collect to assess the risk to be insured and provide a quote. This may include data relating to your health, criminal convictions, or other special categories of personal data
<i>Policy Information</i>	Information about the quotes you receive and policies you take out
<i>Credit, AML & KYC details</i>	Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you
<i>Claims details (previous and current)</i>	Information about previous and current claims, (including other unrelated insurances), which may include data relating to your health, criminal convictions, or other special categories of personal data and in some cases, surveillance reports
<i>Special Category Data</i>	Certain categories of personal data which have additional protection under the GDPR. The categories are health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation

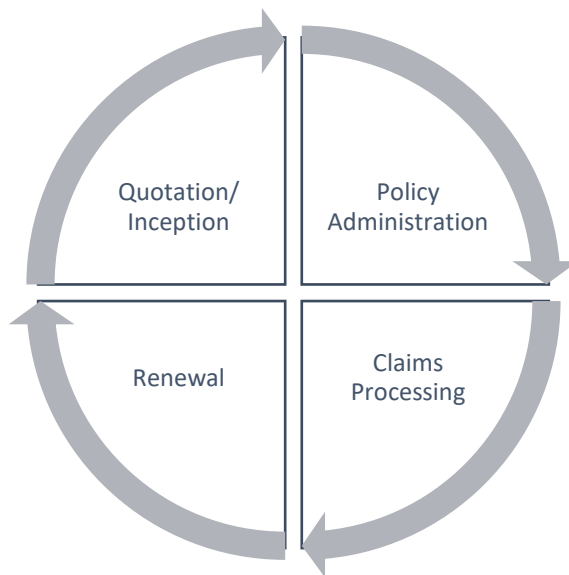
How your data is processed within the insurance lifecycle



Why and How We use Your Personal Data

Our use of your personal information will always have a lawful basis, either because it is necessary for our performance of a contract with or arranged for you, because you have consented to our use of your personal data or because it is in our legitimate interests. We set out below the purposes we and other insurance market participants might use your personal data for.

Purpose	Circumstance
<i>Quotation/ Inception</i>	Setting you up as a client, including possible fraud, sanctions, credit, and anti-money laundering checks. Evaluating the risks to be covered and matching to appropriate policy/ premium. Payment of premium where the insured/policyholder is an individual
<i>Policy Administration</i>	When your policy documents are issued, and premiums are reconciled. When you contact us with a query, to register dissatisfaction or to make a complaint. When we access resources like credit rating, underwriting and government or regulatory body databases, such as the HMT Sanctions Register.
<i>Claims Processing</i>	Managing insurance and reinsurance claims Defending or prosecuting legal claims Investigation or prosecuting fraud This may be conducted through a third-party loss adjustor (TPLA).
<i>Renewals</i>	Evaluating the risks to be covered and matching to appropriate policy/ premium. Payment of premium where the insured/policyholder is an individual.
<i>Commercial Interests</i>	Complying with our legal or regulatory obligations General risk modelling research, analysis and developing statistics Transferring books of business, company sales and reorganisations



Using your personal data: the lawful basis and purposes

To process your personal data, we rely on certain lawful basis, depending on how you interact with our website, platform, or services.

If we do process your personal data, we may use one or more of the following lawful basis for processing:

As necessary **to perform our contract with you** for the relevant insurance product, or service, including:

- To take steps at your request prior to entering into it
- To decide whether to enter into it
- To manage and perform that contract
- To assess credit risk
- To update our records; and
- To trace your whereabouts to contact you about your account and recovering debt

As necessary **for our own legitimate interests** or those of other persons and organisations, including:

- Governance, accounting, managing, and auditing our business operations
- To search at credit reference agencies if you as an individual are over 18 and to confirm your identity
- To monitor emails, calls, other communications, and activities on your account, product, or service
- For market research, analysis and developing statistics
- To send you marketing communications, including automated decision making relating to this
- To identify and contact potential customers using publicly available information and internal insight; and

As necessary **to comply with a legal obligation**, including:

- When you or any of your related persons exercise available rights under data protection law and make requests
- For compliance with legal and regulatory requirements and related disclosures
- For establishment and defence of legal rights
- For activities relating to the prevention, detection, and investigation of crime
- To verify your or any of your related persons' identity, make credit, fraud prevention and anti-money laundering checks; and
- To monitor emails, calls, other communications, and activities on your account, product, or service.

Based on **your consent**, including:

- When you request us to disclose your or any of your related persons' personal data to other people or organisations, such as a person or company handling a claim on your behalf, or otherwise agree to disclosures
- When we process any special categories of personal data about you or your related persons at your request (e.g., your or any of your related persons' racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning your health, sex life or sexual orientation); and
- To send you marketing communications where we've asked for your consent to do so. You are free at any time to change your mind and withdraw your consent.

Sharing of Your Personal Data

We do not sell your personal data.

We may share your personal data with other organisations in the following circumstances:

- Our business and insurance partners e.g. insurance intermediaries, brokers, cover holders, insurers, and reinsurers.
- Third parties who help with the administration of insurance policies such as auditors, claims handlers, loss adjusters, risk managers.
- Other prospective insurers or intermediaries willing to offer insurance.
- The police and various third parties or law enforcement entities where reasonable or necessary to prevent or detect crime.
- If the law or a public authority says we must share the personal data (Government bodies and agencies in the UK, e.g., the Financial Conduct Authority, the Information Commissioner's Office).
- Entities who facilitate fraud detection.
- Industry and other financial regulators and oversight bodies
- Insurance market associations and entities
- We use data processors who are third parties who provide elements of services for us. We have Data Processor Agreements in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us or further sub-processors who must comply with our Data Processor Agreement. They will hold your personal data securely and retain it for the period we instruct.
- We may also transfer personal data we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganisation, spin-off, dissolution, or liquidation).

Rights under Data Protection Law

Right to be Informed about our collection and use of personal data

You have the right to be informed about the collection and use of your personal data. We ensure we do this with our internal data protection policies and through our external website privacy notice. These are regularly reviewed and updated to ensure these are accurate and reflect our data processing activities.

Right to Access Your Personal Information

You have the right to access the personal information that we hold about you in many circumstances, by making a request. This is sometimes termed 'Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 1 month from when your identity has been confirmed.

We would ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.

If you would like to exercise this right, please contact us as set out below.

Right to Correction Your Personal Information

If any of the personal information we hold about you is inaccurate, incomplete, or out of date, you may ask us to correct it.

If you would like to exercise this right, please contact us as set out below.

Right to Stop or Limit Our Processing of Your Data

You have the right to object to us processing your personal information for particular purposes, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances.

You can ask us to restrict processing your data, for example where:

- you're contesting the accuracy of your personal data
- we no longer need to process your personal data, but you want us to keep it for use in legal claims
- you've objected to the processing by asking us to stop using your data, but you're waiting for us to tell you if we have overriding grounds which mean we're allowed to keep on using it

If you would like to exercise this right, please contact us as set out below.

Right to Erasure

You have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances. Where the right doesn't apply, we'll let you know why we can't action your request.

This right may be applied where:

- personal data is no longer necessary in relation to the purpose for which it was originally collected/processed
- the processing was based on your consent which you withdraw (and there are no other legal grounds for processing that data)
- you exercise your right to object and there are no overriding legitimate grounds for the processing
- there is no lawful reason to retain personal data or if the personal data must be erased to comply with a legal obligation

If you would like to exercise this right, please contact us as set out below.

Right to Portability

The right to portability gives you the right to receive personal data you have provided to a controller in a structured, commonly used, and machine-readable format. It also gives them you the right to request that a controller transmits this data directly to another controller.

If you would like to exercise this right, please contact us as set out below.

Automated Decision Making

Before we can offer you an insurance product or service, we may need to conduct the following activities, which involve automated (computer based) decision-making:

Pricing and Underwriting – this process calculates the insurance risks based on the information that you have supplied. This will be used to calculate the premium you will have to pay.

Credit Referencing – using the information given, calculations are performed to evaluate your credit rating. This rating will help us to evaluate your ability to pay for the quoted products and services. These calculations can take place at any stage of a quote, a policy renewal or in certain circumstances where a mid-term amendment to your agreement is requested

The results of these automated decision-making processes are only allowed where we have a legal reason, as they may limit the products and services, we can offer you.

If you do not agree with the result, you have the right to request that we perform a manual reassessment using the same information that you originally provided. In the event you wish to query the automated decision you have received or have a query with your online application please liaise with your broker (details should be available from their website) stating your policy/quotation number.

If you would like to exercise this right, please contact us as set out below.

For more information about your privacy rights

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as Cardstream are available publicly.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have.

Marketing

Aro do not carry out direct to consumer marketing (B2C), however do carry out business to business marketing. Commercial marketing may rely on legitimate interest's purposes when contacting the organisation rather than marketing choices made by an individual. Where we do send marketing the right to object (unsubscribe) will be clearly present on all communications.

Please also note that if you do opt-out of receiving marketing communications from us, we may still send you other important service and administration communications relating to the services which we provide to you, and you cannot opt-out from these service and administration communications.

How long we keep Your Information

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we must keep basic information about our customers for seven years after they cease being customers for tax purposes.

There is no specific statutory limitation period for making a claim under an insurance or reinsurance contract. Insurance contracts are subject to the normal limitation period under the Limitation Act 1980 for causes of action founded on breach of contract (that is, six years from the date on which the cause of action accrues).

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further policy to you.

Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. Platforms, systems, and facilities in which personal data are processed are protected by secure network architectures that contain firewalls and intrusion detection devices.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Once we have received your information, we will use strict procedures and security features to prevent unauthorised access.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Where we store Your Personal Information and International Data Transfers

The personal data that we hold about you will be stored in the UK. In limited circumstances may also be transferred to or stored at a destination outside the UK or European Economic Area (EEA).

If we transfer your data to third party service providers based outside the EEA, we ensure a similar degree of protection is provided to the transfer by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- where we use certain service providers, we may use specific contracts (known as Standard Contractual Clauses) approved by the European Commission which give personal data the same protection it has in Europe, as well as any additional security measures as required.

We will make sure we meet any future requirements the UK or the EU provide following the UK's exit of the EU, including (but not limited to) the legal safeguards discussed above.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Social media buttons

We use plugins on our website from social media networks such as Facebook, LinkedIn, and Twitter. You can recognise these plugins by their logos. Our plugins will not collect personal data about you unless you click on these logos. If you click on them, these plugins are activated and automatically transmit data to the plugin provider.

We do not have any influence over which data these providers collect from you. If you would like more information about their data processing, this can be found in the respective privacy policies on the websites of these providers.

Cookies

We use cookies and similar techniques, such as tags/beacons and JavaScript's, which are small text files stored on your device. Using cookies is a way for us to make sure that our website is continuously improved, meets your needs and can be used as a tool to optimise our marketing strategy. For us to do this, we place functional cookies to make the website function as well as marketing cookies which help us target the right people and show them advertisements. Some of these cookies track your use of our website and visits to other websites and allow us to show you advertisements when you browse other websites.

Please view our Cookie Policy for more information on our use of cookies.

Contacting Us

If you have any questions about how we collect, store, or use your personal information, you may contact Aro at:

Aro Underwriting Group Ltd
Sackville House
55 Buckhurst Avenue
Sevenoaks
Kent
TN13 1LZ
Tel: 01732 783575
Email: dataprotection@aro-underwriting.com

Contacting the Information Commissioner's Office (ICO)

You have a right to complain directly to the Information Commissioner's Office (ICO) if you believe we are in breach of applicable data protection laws and regulations relating to the use of your personal information. The ICO contact details are:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone:
0303 123 1113 (local rate)
01625 545 745 (national rate)

<https://ico.org.uk/make-a-complaint/>