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A. Interpretations and Statement

In this Privacy Policy references to "**we**" or "**us**" or "**Aro**" are to Aro Underwriting Group Ltd, which also includes Aro, Aro Plus and Willow. References to "**you**" and "**your**" also means, where appropriate, your broker, agent or intermediary or a person acting on your behalf.

We are an Insurance Intermediary known as a Managing General Agent (MGA) and are an Appointed Representative (AR) of Ambant Underwriting Services Ltd.

Aro Underwriting Group Ltd considers your privacy a key priority and is responsible for complying with the regulation on data protection. The following Privacy Policy forms part of this commitment and describes how your personal information:

- may be collected and
- might be used

We recommend that you read through this policy and contact us if you have any queries regarding it.

To assist in our data protection oversight and to comply with regulations we have a Data Protection Officer (DPO) who can be contacted using the details that are set out in Section M below.

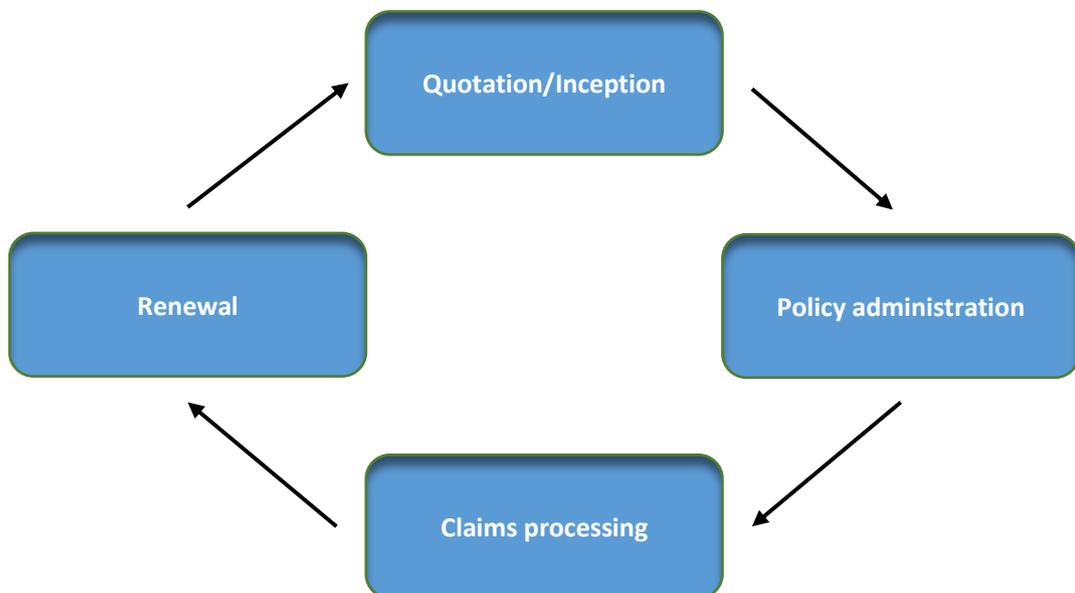
B. A Brief Outline of the Insurance Market

The Insurance market and the products and services it provides gives companies, entities and individuals protection from certain risks. It contains many members including, but not limited to, intermediaries (brokers, agents, coverholders, 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.

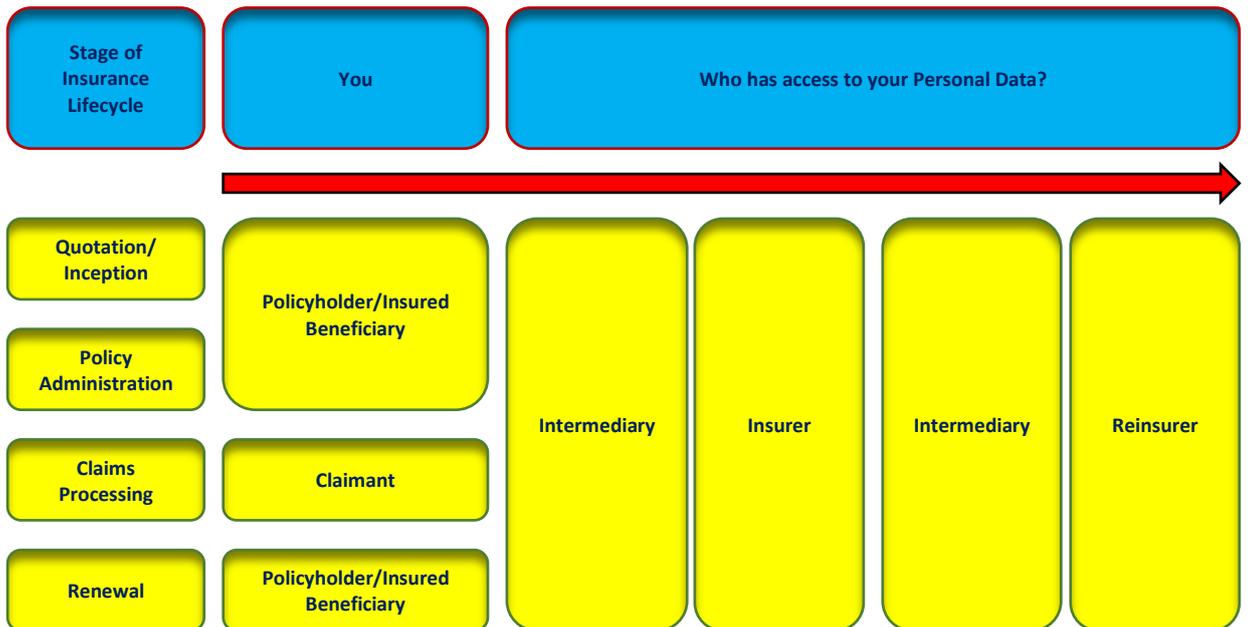
To help understanding this the London Insurance Market Core Uses Information Notice (see link below) sets out those core necessary personal data uses and disclosures. We recommend you review this notice.

(http://lma.informz.ca/LMA/data/images/Bulletin%20att/LMA17_038_MS_att1_information_notice.pdf)

Overview of the Insurance Lifecycle



Personal Data flows through the Insurance Lifecycle



C. Data Protection and Your Rights

You have legal rights regarding your personal information stored and processed by us and these can be exercised by contacting our DPO whose details are given below (please see section M).

There may be times and instances when it may not be possible for us to carry out your request as this may conflict with our own legal and statutory obligations and requirements. Your exercising of these rights (such as the right to deletion of information) may also result in us being unable to carry on providing you with cover under the policy and may therefore result in the cancellation of the policy.

Your eight rights regarding personal information under the regulation are as follows:

- **Access**
You can ask for a copy of your personal information held by us and certain details of how we use it and normally no charge will be made. It will be provided in writing unless we are instructed otherwise by you
- **Rectification**
if you believe or are concerned that the information we have about you is inaccurate you can ask us to update or amend it.
- **Erasure**
There are certain instances where you have the right to ask us to delete your personal information.
- **Restriction or Suspension of Processing**
In some situations e.g. a dispute over the accuracy of information held, you can request us to cease or suspend using your personal information.
- **Data Portability**

There are instances where you can request transfer of your personal information processed by us to a third party.

➤ **Objection to marketing**

You may request for us to cease sending you marketing information and messages.

➤ **Automated decision-making (including profiling)**

You have a right not to be subject to a decision based solely on automated means.

➤ **Objection to Processing**

We may ask for your specific consent in order for us to collect certain personal information, when this has been provided you have the right to withdraw it. This right also applies even if we process your data for legitimate interest reasons, unless it conflicts with our legal responsibilities and obligations.

It is important for you to realise that should you withdraw your permission for us to process, we may be unable to provide you with insurance cover under the policy and result in its cancellation. You may consequently lose the right to bring any claim or receive any benefit under the policy. Your policy terms and conditions set out what will happen in the event your policy is cancelled.

D. Aro's Protection of Your Information

The measures we use to protect your information includes (but is not limited to):

- Staff training,
- Processes and procedures regarding physical and digital security,
- Anti-virus software
- Firewall protection
- Mimecast email security
- Two factor authentication logons
- Cloud based operating model included for storage and backup
- Network alerts from our IT provider detailing unauthorized access or activity alerts
- Confidential waste destruction by shredding

E. Personal Information Collection

i. Why?

We collect and process information so that we can provide our products and services. This includes providing and/or assisting in the provision of insurance quotes, issuing policy documentation and dealing with claims or complaints. The information we collect is also used to analyse various aspects of our business and enables us to meet our legal and statutory obligations. The type of personal information we collect will vary depending on your relationship to us e.g. policyholder, claimant, broker, other intermediary, business partner, service provider, or other third party.

ii. What?

The following information may be collected, but please note it is not an exhaustive list and may vary depending on your relationship to us:

- Your name, title, qualifications, correspondence address, details about how you might be contacted, nationality, date of birth, gender, family and relationship details, job description and your work history and experience.
- Details relating to your insurance policy including underwriting information and material facts.
- Details about a claim or incident that might result in a claim.

- Details about previous policies you have held.
- Information obtained via cookies. (See our Cookies Policy on the Aro website for more information)
- Information obtained when you call us, write to us or email us

It is important for you to understand that there may be the need to ask for and/or obtain 'sensitive' or 'special categories' data from you. For example, we may need access to details of any unspent criminal convictions, alleged offenses, cautions, warnings and sentencing by courts, for the purposes of underwriting a policy, and fraud prevention, detection and investigation.

iii. How?

Your personal information may be collected in a number of ways and through various sources. This may include but is not limited to the following:

- From you directly or another party acting on your behalf e.g. an insurance broker
- From third parties such as your insurer, (sub)broker, (sub)coverholder or intermediary, claimants, third party loss adjusters, account handlers and other providers of professional services associated with your insurance policy
- From databases and listings designed to prevent and detect fraud and sanctioned entities e.g. HMT Sanction Register
- Via government bodies e.g. HMRC and insurance and financial regulators

iv. At What Stage / When?

We may collect information about you at various stages of the Insurance Life Cycle, including:

- **Quotation, New Business and Renewal:** When you, or someone on your behalf, obtains a policy quotation, buys a new policy or renews a policy.
- **Policy Administration:**
 - 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.
- **Claims Processing:** Following a claim or incident which may be covered by your policy. This may be conducted through a third-party loss adjustor (TPLA).

v. From who?

In order to run our business and provide our products and services we may collect information from:

- Policyholders, whether potential, existing or historical
- Any third parties related to cover provided by the policy
- Our various business associates and partners including, but not limited to, intermediaries, brokers, agents, coverholders or MGAs, insurers and reinsurers and other service providers and suppliers

F. Data Use

Your personal information may be processed for a variety of purposes and we are required under the regulation to have a legal reason for doing so. The legal bases for processing broadly include the following:

- **Contractual Obligation**
For providing your insurance policy, in the course of reviewing your submission or application, handling your insurance policy and the associated documentation, assisting in the handling of any claims
- **Legitimate Interest**
For relevant business needs. This may include the storage, monitoring and analysis of records, information and data to prudently manage our business and/ or develop and improve our products and services, providing these activities do not damage your interests.
- **Legal Obligation**
For when a legal or regulatory obligation exists, or when we are required to establish, exercise or defend our legal rights.
- **Consent**
For circumstances where you have provided your consent

Typical examples of how your information is used. Please note that this is not an exhaustive list.

- To assess and evaluate your insurance application and provide a quote
- To enable you to take out an insurance policy
- To ensure general administration and issuance of policy documentation
- To assist, where authorised, in the complaints handling process
- To offer and enable the renewal on the expiry of your policy
- To process claims data
- To comply with legal or regulatory requirements
- To assist with the prevention, detection and investigation of fraud
- To conduct underwriting and claims analysis
- To monitor, review, assess, tailor and improve products and services offered by Aro
- To allow appropriate, necessary and prudent conduct of our business operations such as maintaining accounting records, analysis of financial results, internal and external audit requirements, receiving professional advice (e.g. tax or legal)

G. Sharing Information

We may share your personal information within Aro, or with various business partners, service providers, insurers, insurance intermediaries and other third parties. For further information about the disclosures of your personal information, please see Section M below which provides the relevant contact details.

The following is a non-exhaustive list of third parties that we may share your information with, to fulfil the relevant purposes set out in this Privacy Policy:

- Our business and insurance partners e.g. insurance intermediaries, brokers, coverholders, 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
- Entities who facilitate fraud detection
- Industry and other financial regulators and oversight bodies
- Insurance market associations and entities
- Our third-party service providers e.g. IT suppliers and data processors
- Any third parties associated with the sale, transfer or disposal of our business.

H. The Length of Time we Retain Information

We will only keep your personal information for as long as reasonably necessary to fulfil the relevant purposes set out in this Privacy Policy and in order to comply with our legal and regulatory obligations.

I. Where Do We Store Your Data?

All your data stored by us is on servers based in the UK.

International Transfers

We (or third parties acting on our behalf or with whom we share data) might store or process information collected about you in countries outside the EEA.

Please contact us using the details set out in section M for further information.

J. Automated decision making / Queries with online applications

Automated decision making may be used to calculate the pricing terms and conditions of your quotation and/or policy. 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. Please see Section C above with regards to your rights in this regard.

K. Marketing

Aro do not currently carry out marketing activities, however, should we conduct any marketing in the future this will be performed in accordance with current Data Protection law. Aro will not subscribe you to marketing emails without your consent. Aro will not sell or give away your contact information to any other entities for marketing purposes. Please contact us using the details in Section M if you require further information surrounding marketing activities.

L. 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)

Email: casework@ico.org.uk

M. Contacting Aro

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

Shane Gohil
Data Protection Officer
Qubic Group Plc
Qubic House
C1 The Courtyard
Alban Park, St Albans
Hertfordshire, AL4 0LA

Telephone: 020 8601 7030

Email: shane.gohil@qubicgroup.com

N. Privacy Policy Updates

This Privacy Policy will be reviewed and updated to ensure that it is as accurate and informative as possible. This Privacy Policy was last updated: April 2019

O. Links

If you need to contact your insurer regarding their data protection processes, the relevant details are listed below.

Allied World Assurance Company (Europe) dac

Visit: <https://www.awac.com/privacy-policy>

Email: dataprotection@awac.com

Liberty Mutual Insurance Europe Plc

Visit: <https://www.libertyspecialtymarkets.com/privacy-cookies/>

Email: dataprotectionofficer@libertyglobalgroup.com

MS Amlin plc

Visit: www.msamlin.com/en/site-services/data-privacy-notice.html

Email: dataprotectionofficer@msamlin.com

For further information on how insurance market participants process personal data throughout the insurance lifecycle, please visit:

<https://www.londonmarketgroup.co.uk/gdpr>