

THIS PRIVACY NOTICE DESCRIBES HOW 'WE' ('US') MAY COLLECT, HANDLE AND PROCESS PERSONAL INFORMATION IN RELATION TO YOUR ACCESS TO OR USE OF THE SERVICES.

This privacy notice applies to all of the services, websites and apps offered by us (collectively, the "Services"), but excludes Services which have separate privacy notices that do not incorporate this privacy notice.

The Gallagher Group company which provides each Service is primarily responsible for the personal information collected and held in relation to that Service.

1. PERSONAL INFORMATION WE USE

We may collect personal information about you from a variety of sources, including information we collect from you directly (e.g., when you contact us) and from other sources, described below.

Note that we may be required by law to collect certain personal information about you, or as a consequence of any contractual relationship we may have with you. Failure to provide this information may prevent or delay the fulfillment of these obligations. We will inform you at the time your information is collected if the provision of certain personal information is compulsory and the consequences of the failure to provide such personal information.

1.1 Information we collect directly from you

Depending on the service, website or app that you are using, the categories of information that we may collect directly from you include:

- (a) personal details (e.g., name, date of birth);
- (b) contact details (e.g., phone number, email address, postal address or mobile number);
- (c) government issued identification details (e.g., social security and national insurance numbers, passport details);
- (d) health and medical details (e.g., health certificates);
- (e) policy details (e.g., policy numbers and types);
- (f) bank details (e.g., payment details, account numbers and sort codes);
- (g) driving license details;
- (h) online log-in information (e.g., username, password, answers to security questions);
- (i) information relating to any claims;
- (j) other information we receive from you on applications or required questionnaires (e.g., occupation, current employer); and
- (k) information we collect automatically from you (e.g., click stream data, personal information and other data collected using cookies and other device identifying

technologies ('Cookies')). Further information about our use of Cookies is available at Annex A below.

1.2 Information we collect from other sources:

The categories of information that we may collect about you from other sources are:

- (a) personal details (e.g., name, date of birth);
- (b) contact details (e.g., phone number, email address, postal address or mobile number);
- (c) bank details (e.g., account numbers and sort codes);
- (d) financial information from consumer-reporting agencies for the purpose of ascertaining credit history; and
- (e) policy details (e.g., policy numbers and types).

We may receive such information via insurers, consumer-reporting agencies, from other companies within the Arthur J. Gallagher group, or other third parties in the course of conducting our business.

1.3 Special category personal information

We may also collect certain information about you which is considered more sensitive under local applicable laws, such as:

- (a) health, or disability information required to administer policies or process claims.

Please note that special category personal data will be collected only with your consent.

2. WHAT WILL WE USE YOUR PERSONAL INFORMATION FOR?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We need to use your personal information to enter into or perform our contract with you, for example, in order to fulfil our obligations under our contract and place appropriate insurance cover, we need to use your personal information to provide you with a quote and determine market placement.
- We have a genuine business need to use your personal information such as maintaining our business records and keeping records of insurance policies we place and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm.
- We have a legal or regulatory obligation to use your personal information. For example, our regulators impose certain record-keeping rules to which we must adhere.

Please see below for further details of the different ways we use your personal information:

Purpose for processing	Legal grounds for using your personal information
To evaluate your insurance needs and risk appetite and obtain quotes for you	<p>It is necessary to enter into/perform our contract</p> <p>We have a genuine business need (to determine market placement and place insurance cover for you that is in line with your insurance needs)</p>
To set you up as a customer including carrying out fraud, credit and anti-money laundering checks	<p>It is necessary to enter into/perform our contract</p> <p>We have a genuine business need (to carry out appropriate credit checks and fraud checks)</p> <p>We have a legal or regulatory obligation</p>
Communicating with you and responding to any enquiries you have	<p>It is necessary to enter into/perform our contract</p> <p>We have a genuine business need (to respond to our prospective customers and keep them updated on any future placing of insurance cover)</p>
Complying with our legal or regulatory obligations (such as our requirements to report to the regulator)	We have a legal or regulatory obligation
Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers)	We have a genuine business need (to continually improve our services)
Managing our business operations such as maintaining accounting records, analysing financial results, complying with internal audit requirements and receiving professional advice (e.g. tax or legal advice)	We have a genuine business need (to carry out business operations and activities that are necessary for the everyday running of a business)
Monitoring applications, reviewing, assessing, tailoring and improving our products and services and similar products and services offered by Gallagher	We have a genuine business need (to market our services)
To arrange appropriate insurance cover and provide policy documentation	It is necessary to enter into/perform our contract

	We have a genuine need (to ensure that you have the appropriate policy documentation)
To assist in any claims made under an insurance policy we have placed	It is necessary to enter into/perform our contract We have a genuine business need (to assist customers in any claims they have)
To assist with any renewals, mid-term adjustments of your insurance policy or cancellations	It is necessary to enter into/perform our contract We have a genuine business need (to provide you with appropriate broking services where you request a renewal, mid-term adjustment or cancellation of the insurance policy we have placed)
Prevention and detection of and investigating and prosecuting fraud. This might include sharing your personal information with third parties such as the police, and other insurance and financial services providers.	It is necessary to enter into/perform our contract We have a genuine business need (to ensure that we take all necessary precautions to prevent fraud)
Monitoring usage of any of the various Gallagher websites	We have a genuine business need (to assess usage of our website)
To apply for and claim on our own insurance	We have a genuine business need (to have our own insurance)
To enter into business relationships which facilitate and enable us to place insurance policies for our customers	It is necessary to enter into/perform our contract We have a genuine business need (to enter into arrangements with other insurance partners so that we can provide services to our customers)
To carrying out fraud and anti-money laundering checks	It is necessary to enter into/perform our contract We have a genuine business need (to ensure that we take all necessary precautions to prevent fraud)

3. YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

Depending on which data protection law applies to your personal data, you may have the right to make certain requests in relation to the personal information that we hold about you in our capacity as a data controller. We will not usually make a charge for dealing with these requests. If you wish to exercise these rights at any time please contact us using the details set out in the "Contacting us" section.

There may be cases where we may not be able to comply with your request (such as where this would conflict with our obligation to comply with other regulatory and/ or legal requirements). However, if we can't comply with your request, we will tell you the reason, and we will always respond to any request you make.

There may also be circumstances where exercising some of these rights (such as the right to erasure, the right to restriction of processing and the right to withdraw consent for our continued processing of special categories of your personal information) will mean your insurance can no longer be provided and it may therefore result in cancellation of your policy. You will therefore lose the right to bring any claim or receive any benefit, including in relation to any event that occurred before you exercised your right of erasure, if our ability to handle the claim has been prejudiced. Your policy terms and conditions set out what will happen in the event your policy is cancelled.

Your rights include:

The right to access your personal information

You are entitled to a copy of the personal information we hold about you and certain details of how we use it.

We will usually provide you with your information in writing, unless you request otherwise, or where you have made the request using electronic means, in which case the information will, where possible, be provided to you by electronic means.

The right to rectification

We take reasonable steps to ensure that information we hold about you is accurate and complete. However, you can ask us to amend or update it if you do not believe this is the case.

The right to erasure

You have the right to ask us to erase your personal information in certain circumstances, for example where you withdraw your consent for our processing of the special categories of your personal information, or where the personal information we collected is no longer necessary for the original purpose. This will need to be balanced against other factors, however. For example, we may have regulatory and/ or legal obligations which mean we cannot comply with your request.

The right to restriction of processing

In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that we no longer need to use your personal information or where you think that the personal information we hold about you may be inaccurate.

The right to data portability

You have the right, under certain circumstances, to ask that we transfer personal information that you have provided to us to another third party of your choice.

The right to object to marketing

You can ask us to stop sending you marketing messages at any time. You can do this either by clicking on the "unsubscribe" link which is contained in any email that we send to you or you can use the details set out in the "Contacting us" section to contact us. If you opt out of receiving marketing messages, we may still send you (non-marketing) service related communications where necessary.

Rights relating to automated decision-making

You can contact us using the details set out in the "Contacting us" section and ask us to review the decision if you have been subject to an automated decision and do not agree with the outcome.

The right to withdraw consent

We will ask for your consent for the processing of the special categories of your personal information. We will also ask you for your consent for the purposes of contacting you with our marketing messages. Where we do this, you have the right to withdraw your consent to further use of your personal information.

The right to lodge a complaint with the Datainspektionen.

You have a right to complain to the Datainspektionen if you believe that any use of your personal information by us is in breach of applicable data protection laws and/ or regulations. This will not affect any other legal rights or remedies that you have.

If you would like to discuss or exercise such rights, as applicable under local law, please contact us at the details below.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

We will contact you if we need additional information from you in order to honor your requests.

4. AUTOMATED DECISIONS ABOUT YOU

We do not conduct any automated decision-making or profiling based on your personal information.

5. INFORMATION SHARING

We may share your personal information with third parties for the purposes described in this privacy notice under the following circumstances:

- Service providers and business partners. We may share your personal information with our service providers and business partners that perform marketing services and other business operations for us. For example, we may partner with other companies to process secure payments, fulfill orders, optimize our services, send newsletters and marketing emails, support email and messaging services and analyze information.

- Our group companies. We work closely with other businesses and companies that fall under the Gallagher Group. Our parent company, Arthur J. Gallagher & Co. is based in the United States. We may share your personal information with other Gallagher Group companies (subject to applicable laws or regulations), internal reporting, and other purposes as described in this privacy notice. A general description of the Gallagher Group can be found here: <https://www.ajg.com/about-us/>.
- Law enforcement agency, court, regulator, government or quasi-governmental authority or other third party. We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, to enforce or apply any agreements between us and you, to resolve any disputes, or otherwise to protect our rights or the rights of any third party.
- Asset purchasers. We will not sell your personal information to third parties other than to the extent reasonably necessary to proceed with the consideration, negotiation, or completion of a merger, reorganization, or acquisition of our business, or a sale, liquidation, or transfer of some or all of our assets. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy notice.
- Online ad technology firms. We may transfer information about you to ad technology firms so that they may recognize your devices and deliver interest-based content and advertisements to you. The information may include your name, postal address, email, device ID, or other identifier in encrypted form. These firms may collect additional information from you, such as your IP address and information about your browser or operating system; may combine information about you with information from other companies in data sharing cooperatives in which we participate; and may place or recognize their own unique cookie on your browser.

Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the Services). See the section on "International Data Transfer" below for more information.

When required by applicable law, when we share personal information with corporate third parties we will ensure that such third parties maintain a comparable level of protection of the personal information as set out in this privacy notice by using contractual or other means. To the fullest extent permitted by applicable law, we exclude all liability arising from the use of your personal information by third parties. When required by applicable law, data transfers will be logged and documented, identifying the recipient of the data, the purpose of the transmission, and the type of data that was transmitted. Where required by law to do so, we can on request confirm the name of each third party that personal information is, or will be, transferred to.

6. INFORMATION SECURITY AND STORAGE

We implement technical, organizational, administrative and physical measures to help ensure a level of security appropriate to the risk to the personal information we collect, use, disclose and process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal information. We evaluate these measures on a regular basis to help ensure the security of the processing. Please be aware that, despite our ongoing efforts, no security measures are perfect or impenetrable.

We restrict access to your personal information to those who require access to such information for legitimate, relevant business purposes.

We will keep your personal information for as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal information for a period of time that enables us to:

- maintain business records for analysis and/or audit purposes;
- comply with record retention requirements under the law;
- defend or bring any existing or potential legal claims; and
- address any complaints regarding the Services.

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the personal information.

7. LINKS TO OTHER SITES

We may provide links to other websites not owned or controlled by us that we think might be useful or of interest to you. We are not, however, responsible for the privacy practices used by other website owners or the content or accuracy contained on those other websites. Links to other websites do not constitute or imply endorsement by us of those web sites, any products or services described on those websites or any other material contained in them. We advise that you contact any third party websites directly for their individual privacy policies.

8. INTERNATIONAL DATA TRANSFER

Sometimes we (or third parties acting on our behalf) will transfer personal information that we collect about you to countries outside of the European Economic Area ("EEA"). Our regular transfers include:

Country of Transfer	Reason for the transfer	Method we use to protect your information
India	To assist with our back office functions	Intragroup data transfer agreement (utilising Standard Contractual Clauses (Controller to Processor))

Where other transfers to countries outside of the EEA take place this will be subject to appropriate mechanisms to ensure they have an adequate level of protection.

If you would like further information regarding our data transfers and the steps we take to safeguard your personal information, please see the "Contacting us" section below for our contact details.

9. CONTACT US

The Gallagher Group company which provides each Service is primarily responsible for the personal information collected in relation to that Service.

Our Chief Privacy Officer can be contacted at: GallagherEthicsandCompliance@AJG.com

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to make a complaint to the data protection authority.

10. CHANGES TO THE PRIVACY NOTICE

You may request a copy of this privacy notice from us using the contact details set out above.

Where changes to this privacy notice will have a fundamental impact on the nature of our processing of your personal information or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise any rights you may have under applicable law (e.g. to object to the processing).

We reserve the right to make changes to our Privacy Policy at any time consistent with applicable local laws. Such changes, as long as they do not have a fundamental impact on the nature of our processing of your personal information or otherwise have a substantial impact on you, will be posted on this page. We encourage you to review the Web site and the Privacy Policy in particular periodically for any updates or changes.

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ANNEX A

COOKIES POLICY

1. We may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalized service. They enable us to:
 - (a) estimate our audience size and usage pattern;
 - (b) store information about your preferences, and so allow us to customize our site according to your individual interests;
 - (c) speed up your searches; and
 - (d) recognize you when you return to our site.
- 1.2 You may refuse to accept cookies by activating the setting on your browser which may allow you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site unless otherwise prohibited by applicable law.
- 1.3 We do not use cookies to track or report on activity when you are not on our website or to provide such information to other parties for their own marketing use. We do not use cookies to collect personal information such as your e-mail address, and we do not combine information collected through cookies with your personal information. We make no attempt to look at or examine other cookies or information that may be stored on your computer.