Privacy Notice – Aon Broking Technology

1. Introduction
This Privacy Notice ("Notice") explains how Aon Broking Technology Limited, a private company limited by shares, trading as Aon Centre for Innovation and Analytics, Data and Analytic Services, Aon Carrier Link and Aon Carrier Link for Lloyd’s, ("Aon") makes use of the personal information collected about you in connection with the services. Throughout this Notice Aon may be referred to as "we", "us", "our" or "Aon". Aon is committed to protecting your privacy. This commitment reflects the value we place on earning and keeping the trust of our clients, business partners, and others who share their personal information with us.

2. Collecting Your Information
2.1 The information we collect about you may include the following:
   a. basic personal details, such as your name, surname, address, professional phone number and professional email address;

2.2 You are required to provide any personal information we reasonably require (in a form acceptable to us) to meet our obligations in connection with the services we provide to you, including any legal and regulatory obligations. Where you fail to provide or delay in providing information we reasonably require, to fulfil these obligations, we may be unable to offer the services to you and/or we may terminate the services provided with immediate effect.

3. Processing Your Information
3.1 We will use the information we collect about you in connection with the services to:
   a. offer, administer and manage the services provided to you
   b. deliver data-driven analytics and insights and create analytic solutions in order to drive our business and the business of our clients forward. We are not concerned with an analysis of identifiable individuals, and we take steps to ensure that your rights and the legitimacy of our activities are ensured through the use of aggregated or otherwise de-identified data
   c. to provide underwriters with a warranty from the insured in respect of representations made in the Statement of Fact

If we wish to use your personal information for a purpose which is not compatible with the purpose for which it was collected for, we will request your consent. In all cases, we balance our legal use of your personal information with your interests, rights, and freedoms in accordance with applicable laws and regulations to make sure that your personal information is not subject to unnecessary risk.

4. Legal Grounds for Processing
We rely on the following legal grounds to collect and use your personal information:

   a. Legal and regulatory obligations
      The collection and use of some aspects of your personal information is necessary to enable us to meet our legal and regulatory obligations. For example, Aon is licensed and regulated by the Central Bank of Ireland and is required to provide the service in accordance with relevant regulatory rules.
b Legitimate interests

The collection and use of some aspects of your personal information is necessary to enable us to pursue our legitimate commercial interests, e.g. to operate our business, particularly where we offer other products and services that may be of interest to you or provide analytics services to improve our products and services generally. Where we rely on this legal basis to collect and use your personal information we shall take appropriate steps to ensure the processing does not infringe the rights and freedoms conferred to you under the applicable data privacy laws.

5. Accuracy of Your Information

We rely on the availability of accurate personal information in order to provide the services to you and operate our business. You should therefore notify us of any changes to your personal information, particularly changes concerning your contact details, insurance policy details or any other information that may affect the proper management and administration of the services provided to you.

6. Recipients of Your Information

We generally share your personal information with the following categories of recipients where necessary to offer, administer and manage the services provided to you:

a insurance market participants where necessary to offer, administer and manage the services and insights provided to you, such as insurers and insurance underwriters, reinsurers, brokers, intermediaries and loss adjusters. The insurance underwriter is the insurer that is underwriting your insurance policy and is named in your policy documentation. You should refer to the insurer’s privacy notice on their website for further information about their privacy practices;

b public authorities, regulators and government bodies, where necessary for us to comply with our legal and regulatory obligations;

c third party internal or external suppliers, or outsourcers that process personal information on our behalf. These processing operations shall remain under our control and will be carried out in accordance with our security standards and strict instructions;

d successors of the business, where Aon or the services are sold to, acquired by or merged with another organisation, in whole or in part. Where personal information is shared in these circumstances it will continue to be used in accordance with this Notice.

e other Aon entities, e.g. the Aon broker arranging a service for you with whom you have terms of business

7. Overseas Transfers of Your Information

7.1 We operate on a global and worldwide basis and we therefore reserve the right to transfer personal information about you to other countries to be processed for the purposes outlined in the Notice. In particular, we may make such transfers to offer, administer and manage the services provided to you and improve the efficiency of our business operations. We shall endeavour to ensure that such transfers comply with all applicable data privacy laws and regulations and provide appropriate protection for the rights and freedoms conferred to individuals under such laws.
7.2 Where we collect personal information about you in the European Economic Area (the “EEA”) we may transfer the information to countries outside the EEA for the processing purposes outlined in this Statement. This may include transfers to countries that the European Commission (the “EC”) consider to provide adequate data privacy safeguards and to some countries that are not subject to an adequacy decision. Where we transfer personal information to countries that are not subject to an adequacy decision we shall put in place appropriate safeguards, such as data transfer agreements.

If you would like further information about whether your personal information will be disclosed to overseas recipients, please contact us as noted below. You also have a right to contact us for more information about the safeguards we have put in place (including a copy of relevant contractual commitments, which may be redacted for reasons of commercial confidentiality) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

8. Retention of Your Information
We retain appropriate records of your personal information to operate our business and comply with our legal and regulatory obligations. These records are retained for predefined retention periods that may extend beyond the period for which we provide the services to you. In most cases we shall retain your personal information for no longer than is required under the applicable laws. We have implemented appropriate measures to ensure your personal information is securely destroyed in a timely and consistent manner when no longer required.

9. Information Security
The security of your personal information is important to us and we have implemented reasonable physical, technical and administrative security standards to protect personal information from loss, misuse, alteration or destruction. We protect your personal information against unauthorized access, use or disclosure, using security technologies and procedures, such as encryption and limited access. Only authorized individuals access your personal information, and they receive training about the importance of protecting personal information. Our service providers and agents are contractually bound to maintain the confidentiality of personal information and may not use the information for any unauthorized purpose.

10. Your Information Rights
10.1 You have the following rights under applicable data privacy laws in respect of any personal information we collect and use about you:
   a. The right to access and inspect your personal information or be provided with a permanent copy of the information being held about you.
   b. The right to request the correction of your personal information or in cases where the accuracy of information is disputed, to supplement the information to give notice that you dispute its accuracy.
   c. The right to request the erasure of your personal information, particularly where the continued use of the information is no longer necessary.
   d. The right to object to the use of your personal information, particularly where you feel there are no longer sufficient legitimate grounds for us to continue processing the information.
   e. The right to request the restriction of your personal information from further use, e.g. where the accuracy of the information is disputed, and you request that the information not be used until its accuracy is confirmed.
   f. The right to request that some aspects of your personal information be provided to you or a third party of your choice in electronic form to enable its reuse.
   g. The right to complain to the relevant data protection regulator about our processing of your personal information.
10.2 It is important to note, however, that some of the rights described above in section 10.1 can only be exercised in certain circumstances. If we are unable to fulfil a request from you to exercise one of your rights under applicable data privacy laws, we will write to you to explain the reason for refusal. Where required, further information concerning these rights and their application can be obtained by contacting us.

11. **Complaints**

If you wish to make a complaint about the way we use your personal information you should raise this with us by contacting us in the first instance at Aon Broking Technology Limited:

Data Protection Officer,
Metropolitan Building
James Joyce Street
Dublin 1
Ireland
Email: [DataProtectionIreland@aon.ie](mailto:DataProtectionIreland@aon.ie)

However, if you are not satisfied with the way we have handled your complaint you have the right to raise the matter with the data protection regulator.

Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28
Ireland

[https://www.dataprotection.ie/](https://www.dataprotection.ie/)

12. **Changes to this Notice**

This Notice is not contractual, and Aon reserves the right to reasonably amend it from time to time to ensure it continues to accurately reflect the way that we collect and use personal information about you. Any updates or changes to this Notice will be made available to you. We encourage you to periodically review this Notice so that you will be aware of our privacy practices.

This Notice was last updated on May 31st, 2020.

13. **Contact Information**

If you have any questions relating to this Notice, please contact us at Aon Broking Technology Limited:

Data Protection Officer,
Metropolitan Building
James Joyce Street
Dublin 1
Ireland
Email: [DataProtectionIreland@aon.ie](mailto:DataProtectionIreland@aon.ie)