

Astaara Company Limited ("Astaara") and the companies within the Astaara group ("Astaara Group", "we", "our" and "us") is an international insurance services business headquartered in Guernsey, Channel Islands, and with offices in the London. Astaara Group is committed to protecting the privacy of people that use our services (whether clients or online subscribers), job applicants, current employees, alumni, contacts, business partners and visitors to our website.

This statement applies to the personal information Astaara Group collects when you engage with us for any of our services and products or that Astaara Group otherwise processes in connection with your relationship with us.

A list of the companies within Astaara Group can be found at the end of this Privacy Statement.

## Contents

|    |   |   |
|----|---|---|
| 1  | Controller Of Personal Information.....                           | 2 |
| 2  | Why We Collect Your Personal Information.....                     | 2 |
| 3  | Why Is The Personal Information Processed?.....                   | 2 |
| 4  | What Personal Information Do We Collect And Process?.....         | 4 |
| 5  | Transfer Of Information To Astaara Offices And Third Parties..... | 4 |
| 6  | Transfer Of Information Abroad .....                              | 5 |
| 7  | Retention of Data.....  | 5 |
| 8  | Information Security .....  | 6 |
| 9  | Your Rights.....  | 6 |
| 10 | The Data Protection Officer .....                                 | 7 |
| 11 | Complaints.....   | 8 |
| 12 | Insurance Industry and Data Processing.....                       | 8 |
| 13 | Cookies.....  | 8 |
| 14 | Changes to this Privacy Statement.....                            | 8 |
| 15 | Astaara Group Data Controllers.....                               | 8 |

## 1 Controller Of Personal Information

- 1.1 Astaara Group operates a global business through a number of separate but related legal entities. Any personal information processed by Astaara Group in connection with this Privacy Statement is controlled by one or more of the Astaara Group as a "Data Controller" (as provided for under applicable data protection laws). The Data Controller for personal information collected through the website and the data controller for personal information collected by each of our offices can be found in our Data Controller page at the end of this Privacy Statement.
- 1.2 As set out in this Privacy Statement it may be necessary for or in the legitimate business interests of the Astaara Group to share your personal data and in such circumstances different Astaara Group entities may be joint data controllers of your personal information.
- 1.3 If you have any questions about any aspect of this Privacy Statement please contact us at [data.privacy@astaara.co.uk](mailto:data.privacy@astaara.co.uk) or see the Data Controller section below for individual office contact information.
- 1.4 Please note throughout that this Privacy Statement the word "website" refers to any web page hosted under the [astaara.co.uk](http://astaara.co.uk) domain.

## 2 Why We Collect Your Personal Information

- 2.1 Astaara Group shall only collect and process personal information where it has a legal basis for doing so and this includes where Astaara Group:
  - is fulfilling a contract with you
  - has to comply with a legal duty
  - has your consent to the collection and use
  - has a legitimate interest in collecting and processing the personal information
  - processing personal information that is necessary in the public interest

When personal information is processed, the basis of processing will be in accordance with relevant data privacy laws, our legal obligations and to meet our information security requirements.

## 3 Why Is The Personal Information Processed?

- 3.1 To identify, recruit, and employ members of staff extending to all employees (including Directors and Non-Executive Directors), whether full time, part-time or subcontracted personnel on an ad hoc basis:
  - to remunerate employees;
  - to provide contractual benefits to employees;
  - to provide insurance for the benefit of employees;
  - to complete reference, background checks including CRB/DBS or equivalent ; and
  - to enrol employees in employee share schemes or equivalent.
- 3.2 To perform the essential practice of loss prevention, risk management and consulting:
  - analysing our clients to provide risk advisory services;
  - understanding our client requirements to offer products and services that matches your needs and circumstances;
  - gaining an understanding of the nature of the risk to be advised on including risk modelling and statistical use;
  - to recommend changes and improvements in risk management actions of our clients;
  - to recommend or provide additional services to our clients;
  - to handle and run claims services for clients; and
  - providing competitive and appropriate pricing for advisory services.

- 3.3 We will collect personal data when you obtain a quote for one of our products or services, or in the course of providing you with one of our products or services. We will also collect personal data when you register with us or provide your information through our website, questionnaires and or risk information submitted to support Astaara Group's delivery of the product or service. The types of information we collect may include:
- information you provide us in your risk management or insurance application, including names, addresses, date of birth or other information provided by you in your application for insurance;
  - information you provide us to help us carry out our obligations under any risk management or insurance contract in place between us and you;
  - information you provide us relating to an insurance claim you make; and
  - information you provide us through one of our mobile apps or customer portals.
- 3.4 We will use your personal data, and may share your personal data with other third parties acting on our behalf, for one or more of the following purposes:
- to analyse your insurance needs, and Astaara Group's reinsurance needs;
  - to give you an estimate or provide you with a quote for one of our services or policies;
  - to administer or carry out our obligations under any insurance contract in place between us and you;
  - to assess and adjust any insurance claim you make;
  - to assess and respond to a complaint you might make relating to our products or services; and
  - to ensure the security of your account and our business, preventing or detecting fraud or abuses of our website, for example, by requesting verification information in order to reset your account password.
- 3.5 In certain circumstances, we may need to collect sensitive personal data about you, which may include information about:
- your physical or mental health condition, or the physical or mental health condition of members of your family, or the physical or mental health condition of one of your employees; and
  - any criminal offence or alleged criminal offence committed by you, or members of your family, or one of your employees.
- 3.6 We will only use such sensitive personal data to:
- where we are required to by law;
  - to administer or carry out our obligations under any employment or risk management or insurance contract in place between us and you;
  - to assess and adjust any insurance claim you make; and
  - to assess and respond to a complaint you might make relating to our products or services.
- 3.7 We may also collect non-personal data (i.e. information that has been sufficiently anonymised and aggregated such that you cannot be identified directly or indirectly from it) to:
- ensure compliance with regulatory requirements and applicable law;
  - carry out administrative purposes (including within the Astaara Group), which may include for example, accounting and billing, auditing and identification checking;

- undertake systems testing, maintenance and development and in order to ensure network and information security;
- prevent fraud; and
- market our services and products to you where Astaara Group has a legitimate interest, or you have consented to us doing so and in accordance with your preferences.

You undertake to ensure that any personal data supplied by you in respect of or on behalf of any other person is given with the knowledge and consent of that person.

## 4 What Personal Information Do We Collect And Process?

- 4.1 We capture and process a variety of different types of data, including personal information depending on the nature of the services involved. This includes but is not limited to:

| Type of Personal Information       | Example  |
|------------------------------------|--|
| <b>Individual details</b>          | Name, address, other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, national unique identifier e.g. social security or Public Service number, passport number, driving licence number, employer, job title and employment history, and family details, including their relationship to you, where health insurance requires the declaration of health conditions. |
| <b>Financial information</b>       | Bank account or payment card details, income or other financial information.   |
| <b>Engagement details</b>          | Information about you which we need to collect in order to assess the risk to be insured and provide a quote for either loss prevention, risk management, analytics services and or underwriting. This may include data relating to the nature and structure of management, individual details of directors, criminal convictions, or other special categories of personal data of the people and company to be covered.             |
| <b>Engagement information</b>      | Information about the quotes you receive and policies you take out.  |
| <b>Credit and anti-fraud data</b>  | Credit history, credit score, sanctions and criminal offences, and information received from various anti-fraud databases relating to you or those seeking cover.  |
| <b>Previous and current claims</b> | 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.  |

## 5 Transfer Of Information To Astaara Offices And Third Parties

- 5.1 Astaara Group shares data between our offices globally, where necessary, for the purposes outlined in this Privacy Statement. Astaara Group has a data sharing agreement in place between the Astaara legal entities globally that ensures that your personal information is shared in accordance with applicable data protection laws, at all times providing protection to your personal information and your rights.

- 5.2 Astaara Group has business relationships with third parties. In some instances we may disclose your personal information to third parties where this is necessary to perform the services for which you have engaged Astaara Group or otherwise in furtherance of an outsourcing or other data processing arrangement. In those circumstances Astaara Group will ensure that the third party is contractually bound to only process personal information in accordance with applicable data protection laws and with Astaara Groups's specific instructions and requirements, and at all times in a manner that protects your rights under applicable data protection laws.
- 5.3 Our suppliers and service providers will be required to meet our standards on processing information and security. The information we provide them, including your information, will only be provided in connection with the performance of their function. They will not be permitted to use your information for any purposes other than those outlined in this Privacy Statement.
- 5.4 In relation to any other third parties, Astaara Group will only disclose or transfer your information where you have given your consent or where we are required to do so by law or other regulatory code or practice, or where it is necessary for the purpose of, or in connection with legal proceedings or in order to exercise or defend legal rights.

## 6 Transfer Of Information Abroad

- 6.1 As part of the transfers of personal information under paragraph 5 above, personal data may be transferred to or accessed from countries whose laws provide a level of protection for personal data not always equivalent to the level of protection that may be provided in your own country. In particular, if you are located inside the European Economic Area ("EEA") or Guernsey your personal information may be transferred to a country outside of the EEA and Guernsey.
- 6.2 Astaara Group ensures that cross border transfers comply with all relevant laws and regulations and in addition, we enforce the highest privacy and data management standards across all our offices through Astaara Group's global Data Protection Policy (a copy of that policy may be obtained by contacting Astaara at [data.privacy@astaara.co.uk](mailto:data.privacy@astaara.co.uk)).
- 6.3 Astaara Group will only transfer your personal information to a country that is deemed to have an adequate level of protection under the applicable data protection law or otherwise where Astaara Group has put in place adequate safeguards to protect the personal information. In particular, where Astaara Group sends your personal information outside of the EEA and Guernsey, Astaara Group shall only do so where the recipient of the information is subject to:
  - binding corporate rules;
  - standard data protection clauses approved under applicable law;
  - an approved code of conduct; or
  - an approved certification mechanism.

Further details on the safeguards adopted by Astaara Group may be obtained by contacting Astaara at [data.privacy@astaara.co.uk](mailto:data.privacy@astaara.co.uk)

## 7 Retention of Data

- 7.1 Astaara Group shall only retain your personal information for so long as there is a reasonable need to retain the information for the purposes set out in this Privacy Statement. Astaara Group will retain the personal information for seven years after the cessation of our the business relationship, other than when we are legally required to hold the data for a longer period.

## 8 Information Security

- 8.1 Astaara Group implements technical and organisational measures to ensure a level of security appropriate to the risk to the personal information that we process. These measures are aimed at ensuring the on-going integrity and confidentiality of your personal information. Astaara Group evaluates these measures on a regular basis to ensure the security of the processing.

## 9 Your Rights

- 9.1 You have various rights in respect of the personal information that we collect, use, disclose and transfer concerning you. These rights are set out below. Should you wish to exercise your rights please contact us at [data.privacy@astaara.co.uk](mailto:data.privacy@astaara.co.uk):

| Right                                    | Comment   |
|--|---|
| <b>Right of Access</b>                   | <p>You are entitled to obtain from us details concerning the processing of your personal information.</p> <p>This includes details of the data being processed, the purposes of the processing, any recipients of that information, the period for which the information is processed, the source of the information (if it is not provided by you), any international transfers of the information and the protections we put in place to protect your information. You are also entitled to details of any automated decision making, including profiling, involving your information.</p> <p>You are entitled to a copy of the personal information we process about you (including in electronic form). Additional copies may be subject to a reasonable administrative fee.</p>                      |
| <b>Right to Rectification</b>            | <p>You are entitled to have any incomplete and inaccurate personal information held by us rectified.</p>  |
| <b>Right to Erasure ("be forgotten")</b> | <p>In certain circumstances you are entitled to have personal information erased, including where this is no longer necessary for the purposes for which it was collected and/or processed, or you withdraw consent to our use of the information.</p> <p>We may continue processing the information in certain circumstances, including: if there are grounds other than consent for processing the information; where processing is in compliance with a legal obligation or for reasons of public interest; or for the exercise or defence of legal claims.</p> <p>If you request that we erase your personal information we shall advise you if we consider that there are on-going grounds permitting us to continue processing your information.</p>  |
| <b>Right to Restrict Processing</b>      | <p>You can ask us to restrict the processing of personal information Astaara Group holds about you if: you contest the accuracy of the personal information we process about you; you consider that the processing is unlawful but you do not want us to erase the information; we do not require to continue processing the information but you wish the information to be retained in connection with a legal claim; or you have objected to the grounds upon which we process the information.</p> <p>Where you have asked us to restrict processing the information we shall only hold, process and erase the information as permitted by you or as permitted by applicable data protection laws. We will advise you if we do not agree with your request to restrict processing and our reasons.</p> |

| Right                            | Comment   |
|----------------------------------|---|
| <b>Right to Data Portability</b> | Where you provide personal information to us and consent to us using it and the processing is carried out by automatic means you are entitled to receive a copy of that information in a machine-readable format and for that to be provided to another data controller, where technically possible.  |
| <b>Right to Object</b>           | <p>You are entitled to object to Astaara Group collecting, using and otherwise processing your personal information where the basis for the processing is Astaara Group's legitimate interests or the processing is in the public interest.</p> <p>In such circumstances we shall cease processing your personal information unless: we are legitimately processing the information on a different basis; there are compelling legitimate grounds for continuing to process the personal information; or we are otherwise permitted to process the information under applicable data protection laws.</p> <p>If applicable, we will advise you of the basis upon which Astaara continues to process your personal information. If you are not clear of the ground(s) upon which we collect, use and process your personal information you can ask us to confirm this to you, as part of the Right of Access outlined above.</p> |
| <b>Right to Withdraw Consent</b> | Where you have given us consent to make use of your personal information for any of the purposes outlined in this Privacy Statement you shall be entitled to withdraw that consent. You may do this by emailing us at <a href="mailto:data.privacy@astaara.co.uk">data.privacy@astaara.co.uk</a>  |
| <b>Right to Complain</b>         | <p>In the event that you have any questions, concerns or complaints regarding this Privacy Statement or the manner in which Astaara Group collects, uses and otherwise processes your personal information we shall always seek to address the same promptly and to your satisfaction.</p> <p>However if you consider that we have not done so you are entitled to lodge a complaint to your local supervisory authority. If you are unclear who the appropriate supervisory authority is for you, please contact us at <a href="mailto:data.privacy@astaara.co.uk">data.privacy@astaara.co.uk</a></p>  |

## 10 The Data Protection Officer

10.1 We have appointed a data protection officer (DPO), who is responsible for overseeing questions in relation to this privacy statement. If you have any questions about this privacy statement, including any requests to exercise your legal rights, please contact the DPO using the details set out below:

Email address: [William.egerton@astaara.co.uk](mailto:William.egerton@astaara.co.uk)

Postal address: POBox 142, The Beehive, Rohais, St Peter Port, Guernsey GY13HT

10.2 If you contact us regarding the exercise of your rights, we will seek to action your wishes. There may be in some cases (particularly where the request relates to the restriction of use of personal data, the objecting to the use of personal data or the erasure of the data) reasons why we are not able to fully comply with your request, particularly where we are required to keep and use that data to comply with contractual, legal or regulatory requirements.

## 11 Complaints

- 11.1 Astaara Group is committed to providing high quality products and services. If you feel that we have not met your expectations, we'd like to know so we can put things right for you. You can submit a complaint by writing to the following address: [complaints@astaara.co.uk](mailto:complaints@astaara.co.uk)
- 11.2 We would expect that any complaint can best be dealt with by contacting us in the first instance, and we will take complaints made to us seriously. However, if you wish to complain about our use of your personal data, and do not wish to contact us first, you also have the right to complain directly to the supervisory authority. Full details on this can be found on the following websites:
- UK: <https://ico.org.uk/>
  - Guernsey: <https://odpa.gg/>

## 12 Insurance Industry and Data Processing

- 12.1 Further details of how the insurance industry uses and processes data can be found within the following websites and please note that Astaara Group is not responsible for the content.
- <https://www.londonmarketgroup.co.uk/gdpr>
- <https://admin.londonmarketgroup.co.uk/wp-content/uploads/2018/06/LMA-Insurance-Market-Information-Uses-Notice-post-enactment-31-05-2018.pdf>

## 13 Cookies

- 13.1 Cookies are text files containing small amounts of information which are downloaded to your device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognises that cookie. Cookies are useful because they allow a website to recognise a user's device. Cookies do lots of different jobs, like letting you navigate between pages efficiently, remembering your preferences, and generally improve the user experience. They can also help to ensure that adverts you see online are more relevant to you and your interests. For information on the cookies used on Astaara Group's website, please see our Cookie Policy.

## 14 Changes to this Privacy Statement

- 14.1 If we change our privacy statement in any way, we will post these changes on this page. You are responsible for checking this privacy statement whenever you access the Astaara website: [www.astaara.co.uk](http://www.astaara.co.uk).

## 15 Astaara Group Data Controllers

| Jurisdiction | Data Controller                | Address  |
|--------------|--------------------------------|--|
| Guernsey     | Astaara Company Limited        | PO Box 142, The Beehive, Rohais, St Peter Port, Guernsey GY1 3HT |
| Guernsey     | Diciannove Investments Limited | PO Box 142, The Beehive, Rohais, St Peter Port, Guernsey GY1 3HT |
| Guernsey     | Diciannove One Limited         | PO Box 142, The Beehive, Rohais, St Peter Port, Guernsey GY1 3HT |
| UK           | [insert if applicable]         | [insert if applicable]   |