

Aon Arabia Insurance Brokers LLC Privacy Notice

Introduction

Aon Arabia Insurance Brokers LLC ("**AAIB**") is a leading professional services insurance brokerage that provides a broad range of risk and health solutions for clients in the Kingdom of Saudi Arabia.

AAIB is committed to protecting your privacy. This commitment reflects the value we place on earning and keeping the trust of our employees, customers, clients, business partners and others who share their personal data with us.

This Privacy Notice ("**Notice**") explains how AAIB (collectively referred to as "we", "us", "our") makes use of the personal data collected about you in connection with our services.

Contact Details

Aon Arabia Insurance Brokers LLC
Department: Privacy
Address: KKI Airport Branch Road, Qurtuba District,
Riyadh 11565, PO Box 61192, Kingdom of Saudi Arabia
Phone Number: +966 11 442 2700
Email: Privacy.Assurance@aon.com.sa
AAIB Insurance Authority License: 20084 / 16 / ش / ط / وس
Commercial Register: 7001589873

Date of Last Update

The Notice was last updated on 18 of September 2024.

AAIB Privacy Notice

This Notice aims to help you understand our personal data collection, usage, storage, retention and disclosure practices, together with our rights, by explaining:

1. Collecting your personal data
2. Processing your personal data
3. Legal grounds for processing
4. Accuracy of your personal data
5. Recipients of your personal data
6. Transfers of your personal data
7. Retention of your personal data
8. Information security
9. Your rights
10. Direct marketing
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1. Collecting your personal data

The personal data we collect varies depending upon the nature of our services. For the services provided by AAIB, your employer is cooperating with AAIB to give you the best possible service and advice within insurance broking. This involves AAIB processing personal data about you that we receive from your employer or from you directly.

In addition, we may also collect personal data about you from other third parties, such as insurers, underwriters, reinsurers, credit reference agencies, medical professionals, government bodies, claimants, vetting and data validation agencies and other professional advisory service providers. This information may be sourced prior to and during the course of providing the services to you.

This Notice provides an overview of the categories of personal data we collect, this may include the following:

- a. **Basic personal details**, such as your name, address contact details, email address, date of birth, age, gender, job title, place of work, passport number and nationality;
- b. **Demographic details**, such as information about your lifestyle, and insurance requirements: including registration details of your car, van, motorcycle or any other form of motor vehicles and accident reports;
- c. **Health information**, such as information about your health status, medical records and medical assessment outcomes which may be required for the purposes of underwriting or claims processing;
- d. **Driving history, certifications and insurance details**, such as driving license details, the period for which a license has been held, existing and previous insurance policy details, previous accident and claims history and details of any motoring convictions; and
- e. **Claims details**, such as information about any claims concerning your insurance policy received indirectly from insurance or reinsurance companies.

2. Processing your personal data

The purposes we will use the personal data we collect about you in connection with the services are:

- a. **Client due diligence**: carry out due diligence, identity, credit reference, bankruptcy, sanctions, data validation and other vetting and risk management agency checks;
- b. **Consultancy and advisory services**: evaluate risks relating to your prospective or existing reinsurance policy and perform analytics for risk modelling purposes and to analyze trends;
- c. **Provision of financial services**: process your payment for the insurance premium and any mid-term adjustments;
- d. **Insurance administration**:
 - assess your application to receive the services;

- offer, administer and manage the services provided to you, including providing initial and renewal quotations and client care information;
 - managing insurance and reinsurance claims;
 - investigate and settle claims or complaints in relation to reinsurance policies and/or the services provided;
- e. Preventing and detecting fraud:** facilitate the prevention, detection and investigation of crime and the apprehension or prosecution of offenders including compliance with applicable anti-money laundering laws and regulations;
- f. Debt administration and factoring:** trace debtors and recover any outstanding debt in connection with the services provided;
- g. Legal and regulatory obligations:** fulfil legal and regulatory obligations and monitor compliance with the same;
- h. Transfer:** transfer books of business to successors of the business in the event of a sale or reorganization including the planning and due diligence purposes both prior to closing and after a transaction has closed;
- i. Market research:** conduct market research and canvass your views about the services in order to develop and improve our products and service offerings generally; and
- j. Benchmarking, modelling and analysis:** perform benchmarking, modelling, market research and data analysis associated with the development of new and existing processes, products and services.

3. Legal grounds for processing

We rely on the following legal grounds to collect and use your personal data:

- a. Performance of the service contract:** where we offer the services or enter into a contract with you to provide the services, we will collect and use your personal data where necessary to enable us to take steps to offer you the services, process your acceptance of the offer and fulfil our obligations in the contract with you.
- b. Legal and regulatory obligations:** the collection and use of some aspects of your personal data is necessary to enable us to meet our legal and regulatory obligations. AAIB is licensed in the Kingdom of Saudi Arabia and regulated by the Insurance Authority ("IA") and by the Saudi Data and AI Authority ("SDAIA"). AAIB is required to provide the services in accordance with relevant insurance and personal data protection laws and regulatory rules.
- c. Legitimate interest:** in providing you and your employer with the best possible advice in relation to our insurance broking services and to fulfill our contractual obligations to your employer, the collection and use of some aspects of your personal data is necessary to enable us to pursue our legitimate interests. For example, we have legitimate interests in:
- providing professional services across our solution lines;

- operating our business, and managing and developing our relationships with clients, suppliers and with you;
- understanding and responding to inquiries;
- disclosure of fraud operations and the protection of network and information security;
- improving our services; and
- understanding how you and our clients use our services and websites.

Where we rely on this legal basis to collect and use your personal data, 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.

- d. Actual interests of the data subjects:** when communicating with you is impossible or difficult, the processing of your personal data may be necessary to enable us to serve your actual interests. Where we rely on this legal ground to collect and use your information, we retain evidence that such interest exists and that it is difficult to contact or communicate with you.
- e. Consent:** we rely on your consent retrieved from your employer, to collect and use personal data concerning insurance broking, specifically for the purpose of assessing risks relating to your prospective or existing insurance policy. We may also share this information with other insurance market participants and third parties where necessary to offer, administer and manage the services provided to you, such as insurers and insurance underwriters, reinsurers, brokers and vetting agencies. Where we rely on your consent to collect and use your information, you are not obliged to provide your consent and you may choose to subsequently withdraw your consent at any stage once provided. However, where you refuse to provide information that we reasonably require to provide the services, we may be unable to offer you the services and/or we may terminate the services if not possible to fulfil the services without the respective information.

Where you choose to receive the services from us you agree to the collection and use of your personal data in the way we describe in this section of the Notice and in accordance with the legal grounds described above. You also agree that such information may be collected and used for the above purpose by the insurance underwriter named in your insurance policy documentation. You should refer to the insurer's privacy policy on their website for further information about their privacy practices.

4. Accuracy of your personal data

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

5. Recipients of your personal data

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

- a. **Within Aon:** subject to any regulatory approvals, we may share your personal data with other Aon entities, brands, divisions, and subsidiaries for the processing purposes outlined in this Notice;
- b. **Insurance market participants** where necessary to offer, administer and manage the services 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 policy on their website for further information about their privacy practices;
- c. **Legal advisers, loss adjusters, and claims investigators**, where necessary to investigate, exercise or defend legal claims, reinsurance claims or other claims of a similar nature;
- d. **Medical professionals**, e.g. where you provide health information in connection with a claim against your insurance policy;
- e. **Law enforcement bodies**, where necessary to facilitate the prevention or detection of crime or the apprehension or prosecution of offenders;
- f. **Public authorities, regulators and government bodies**, where necessary for us to comply with our legal and regulatory obligations;
- g. **Third party suppliers**, where we outsource our processing operations to suppliers that process personal data 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; and
- h. **Successors of the business**, where AAIB or the services are sold to, acquired by or merged with another organisation, in whole or in part. Where personal data is shared in these circumstances it will continue to be used in accordance with this Notice.

6. Transfers of your personal data

AAIB's current cloud storage is based in the Kingdom of Saudi Arabia. We are part of a global organization and may be needed from case to case to transfer certain personal data across geographical borders in accordance with applicable laws.

Under such circumstances, we use a variety of legal mechanisms to help ensure your rights and protections continue to apply to your personal data, such as:

- a. We ensure transfers between Aon affiliates are covered by intra-group agreements that incorporate prescribed contractual wording in accordance with the regulations issued by the Insurance Authority, such as the 2012 Outsourcing Regulation for Insurance and Reinsurance Companies and Insurance Service Providers (the "**2012 Outsourcing Regulation**") which provides for the transfer of certain personal data outside of the Kingdom of Saudi Arabia. In accordance with this 2012 Outsourcing Regulation, insurers and insurance service providers should seek IA's written approval prior to undertaking any material outsourcing.

- b. In certain occasions we reserve the right to transfer personal data about you to other countries outside the Kingdom of Saudi Arabia to be processed for the purposes outlined in this Notice. This may include transfers to countries that the data privacy regulator in the Kingdom of Saudi Arabia (Saudi Data & AI Authority ("**SDAIA**") considers providing adequate data privacy safeguards and to some countries that are not subject to an adequacy decision. Where we transfer personal data to countries that are not subject to an adequacy decision we shall put in place appropriate safeguards, such as data transfer agreements approved by the data privacy regulator in the Kingdom of Saudi Arabia. Where required, further information concerning these safeguards can be obtained by contacting us.

7. Retention of your personal data

We retain appropriate records of your personal data 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 data for no longer than is required under the applicable laws. We have implemented appropriate measures to ensure your personal data is securely destroyed in a timely and consistent manner when no longer required.

8. Information security

The security of your personal data is important to us, and we handle personal data with care and treat it confidentially. We take appropriate technical and organizational measures to prevent misuse, loss, unauthorized access and other unwanted actions with personal data. Therefore, we have implemented appropriate security measures to protect the confidentiality, integrity and availability of the personal data we collect about you and ensure that such information is processed in accordance with applicable laws.

9. Your information rights

You have the following rights under applicable data privacy laws in respect of any personal data we collect and use about you:

- a. **Right to be informed:** you are entitled to be informed how we collect your personal data including the lawful basis and the purpose of collection, the personal data to be collected, the means used for collection, processing, storage, and destruction, and information about your rights and how to exercise them. You can access all details through this Notice, or you can contact us using the below contact details.
- b. **Right to access and inspect** your personal data or be provided with a permanent copy of the information being held about you in electronic form.
- c. **Right to request the correction** of your personal data or in cases where the accuracy of information is disputed, to supplement the information to give notice that you dispute its accuracy.

- d. **Right to request the erasure** of your personal data, particularly where the continued use of the information is no longer necessary to achieve the purpose for which it was collected.
- e. **Right to withdraw your consent** where we are relying upon consent as the legal ground to process your personal data. Under such circumstances you may also request that we erase your personal data where there is no other lawful basis available to us.
- f. **Right to complain to the relevant data protection regulator** about our processing of your personal data.

It is important to note, however, that some of the rights described above in section 9 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.

10. Direct Marketing

AAIB does not process your personal data for direct marketing purposes.

11. Complaints

If you wish to make a complaint about the way we use your personal data, you should raise this with us by contacting us in the first instance:

Aon Arabia Insurance Brokers LLC
Department: Privacy
KKI Airport Branch Road, Qurtuba District
Riyadh 11565PO Box 61192, Kingdom of Saudi Arabia
Email: Privacy.Assurance@aon.com.sa

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

The Saudi Data and AI Authority
Kingdom of Saudi Arabia, Riyadh
حي النخيل- بالمدينة الرقمية
Building Code: 1003-B001
Saudi Arabia - Riyadh – 12382

Website: sdaia.gov.sa
National Data Governance Platform "DGP": dgp.sdaia.gov.sa

12. Changes to this Notice

This Notice is not contractual and AAIB 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 data about you. Any

updates or changes to this Notice will be made available to you. You should periodically review this Notice to ensure you understand how we collect and use your personal data.

This version was published on 18 of September 2024.