

Privacy Notice

1. Introduction

This Privacy Notice (“**Notice**”) explains how Aon Middle East LLC and its affiliated companies and subsidiaries (“**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”.

2. Collecting Your Information

2.1 The information we collect about you may include the following:

- a. basic personal details, such as your name, address contact details, passport or Emirates ID copies, date of birth, age, gender and marital status;
- b. demographic details, such as information about your lifestyle, and insurance requirements;
- c. health information, such as information about your health status, medical records and medical assessment outcomes;
- d. driving history, certifications and insurance details, such as driving licence details, the period for which a licence has been held, existing and previous insurance policy details, previous accident and claims history and details of any motoring convictions;
- e. financial details, such as payment card and bank account details and details of your credit history and bankruptcy status;
- f. claims details, such as information about any claims concerning your insurance policy; and
- g. your marketing preferences.

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.

2.3 Where you provide personal information to Aon about third party individuals (e.g. information about your spouse, civil partner, child(ren), dependants or emergency contacts), where appropriate, you should provide these individuals with a copy of this Notice beforehand or ensure they are otherwise made aware of how their information will be used by Aon.

2.4 In addition to collecting personal information from you directly, we may also collect personal information about you from other third parties, such as your employer, 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.

3. Processing Your Information

3.1 We will use the information we collect about you in connection with the services to:

- a. **Consultancy and Advisory Services:**
 - evaluate risks relating to your prospective or existing insurance policy;
 - perform analytics for risk modelling purposes and to analyse trends;
- b. **Provision of Financial Services:** process your payment for the insurance premium and any mid-term adjustments;
- c. **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;
 - investigate and settle claims or complaints in relation to insurance policies and/ or the services provided;
- d. **Policing:** facilitate the prevention, detection and investigation of crime and the apprehension or prosecution of offenders;

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- e. **Debt Administration and Factoring:** trace debtors and recover any outstanding debt in connection with the services provided;
- f. **Legal Services:** fulfil legal and regulatory obligations and monitor compliance with the same;
- g. **Accounting and Auditing:** transfer books of business to successors of the business in the event of a sale or reorganisation;
- h. **Research:** conduct market research and canvass your views about the services in order to develop and improve our products and service offerings generally; and
- i. **Advertising, Marketing and Public Relations for the Controller Itself:** offer other products and services that may be of interest to you.

4. Legal Grounds for Processing

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

- a. 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 conduct market research 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.

Where you choose to receive the services from us you agree to the collection and use of your personal information in the way we describe in this section of the Notice and in accordance with the lawful bases described herein. 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 notice on their website for further information about their privacy practices.

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, 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.

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 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. legal advisers, loss adjusters, and claims investigators, where necessary to investigate, exercise or defend legal claims, insurance claims or other claims of a similar nature;
- c. medical professionals, e.g. where you provide health information in connection with a claim against your insurance policy;
- d. law enforcement bodies, where necessary to facilitate the prevention or detection of crime or the apprehension or prosecution of offenders;
- e. public authorities, regulators and government bodies, where necessary for us to comply with our legal and regulatory obligations;
- f. third party suppliers, where we outsource our processing operations to suppliers 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; and

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- g. 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.

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 Dubai International Financial Centre (“DIFC”) we may transfer the information to jurisdictions outside the DIFC for the processing purposes outlined in this Statement. This may include transfers to jurisdictions that the DIFC Commissioner for Data Protection (“DIFC Commissioner”) considers 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 approved by the DIFC Commissioner. Where required, further information concerning these safeguards can be obtained by contacting us.

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 a retention period of 15 years 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 appropriate security measures to protect the confidentiality, integrity and availability of the personal information we collect about you and ensure that such information is processed in accordance with applicable data privacy laws.

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 revoke your consent where we are relying upon consent as the lawful basis to process your personal information. Under such circumstances you may also request that we erase your personal information where there is no other lawful basis available to us.
b.	The right to access and inspect your personal information or be provided with a permanent copy of the information being held about you in electronic form.
c.	Where technically feasible, the right to request the correction of your personal information or in cases where the accuracy of information is disputed.
d.	The right to request the erasure of your personal information, particularly where the continued use of the information is no longer necessary.
e.	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.
f.	The right to object to the use of your personal information for direct marketing purposes. See section eleven (11) below for further information. See section 11 below.
g.	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.
h.	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.
i.	The right to object to any decision based solely upon automated processing, including any profiling, which produces legal consequences or other seriously impactful consequences. Under such circumstances you may require us to review such decision manually. See section twelve (12) below for further information. See section 12 below.

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j.	The right to complain to the relevant data protection regulator about our processing of your personal information.
k.	The right not to be discriminated against by exercising any of the rights listed at (a) – (j) above.

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. Direct Marketing

We will use your personal information to send you direct marketing about other products and services that we feel may be of interest to you. We will give you the opportunity to refuse direct marketing at the point that you apply or register to receive the services and on each occasion thereafter that you receive direct marketing communications from us. You can also change your marketing preferences at any stage by contacting us.

12. Automated Decisions

Where you apply or register to receive the service we may carry out a real-time automated assessment to determine whether you are eligible to receive the service. An automated assessment is an assessment carried out automatically using technological means (e.g. computer systems) without human involvement. This assessment will analyse your personal information and comprise a number of checks, e.g. credit history and bankruptcy check, validation of your driving licence and motoring convictions, validation of your previous claims history and other fraud prevention checks. Where your application to receive the service does not appear to meet the eligible criteria, it may be automatically refused and you will receive notification of this during the application process. However, where a decision is taken solely by automated means involving the use of your personal information, you have the right to challenge the decision and ask us to reconsider the matter, with human intervention. If you wish to exercise this right you should contact us.

13. 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:

Data Protection Officer
 Al Fattan Currency House
 Dubai International Financial Centre
 Tower 2, Level 5
 P.O. Box 506746
 United Arab Emirates
 Email: privacyME@aon.com

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.

Commissioner of Data Protection
 Level 14
 The Gate
 P.O. Box 74777
 Dubai
 Email: commissioner@dp.difc.ae

14. 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. You should periodically review this Notice to ensure you understand how we collect and use your personal information.

15. Contact Information

If you have any questions about the content of this Notice or the rights conferred to you under the applicable data privacy laws you should contact us at the following address:

Data Protection Officer
 Al Fattan Currency House
 Dubai International Financial Centre
 Tower 2, Level 5

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