

Global Privacy Statement for personnel of the Aspen Group

Aspen's commitment to your privacy

Aspen is committed to protecting and respecting your privacy rights and will comply with all applicable data protection and privacy laws. This Statement tells you about the use that Aspen will make of the personal information we hold about you, how we will collect certain personal information, under what circumstances we may share or otherwise use the information and to whom we may disclose it.

This Statement applies to prospective, current and former employees, directors, officers, contractors and workers. This includes temporary or agency workers, students, interns, secondees and consultants. This Statement does not form part of any contract of employment or other contract to provide services.

This Statement makes clear that, subject to applicable local laws, the personal information Aspen holds about you will be:

- used lawfully, fairly and in a transparent way;
- collected and processed only for specific, explicit and legitimate purposes;
- adequate, relevant and limited to the purposes we have told you about;
- accurate and kept up to date;
- kept only as long as necessary; and
- kept securely.

Where we refer to "employment data" or "employment" in this Statement, we do so for convenience only, and this should in no way be interpreted as purporting to confer employment status on non-employees to whom this Statement also applies.

Your data will not be sold to any third party.

Your rights

You have the right to access personal data we hold about you and to request correction, rectification or erasure of such personal data, or to request its transfer. You may also object to the processing of your personal data or request the restriction of processing of your personal data under certain circumstances. Aspen has implemented a number of internal policies and processes to support these rights and to ensure that we can meet valid requests in line with the requirements of the GDPR or other applicable local laws. Aspen does not discriminate on the basis of having exercised these rights.

If you wish to invoke any of these rights, you may address your requests to Aspen's Group Data Privacy Officer at: dpo@aspen.co. California residents may also submit requests via our [California Consumer Privacy Act Request Portal](#) or by calling 1-888-502-0625. Only you or someone that you authorise to act on your behalf may submit these requests. Your request must provide sufficient information for us to reasonably verify that you are the person about whom we collected personal information and sufficient detail to allow us to properly understand, evaluate and respond to your request.

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In response to such request, we may also ask you to verify your identity or to provide additional information that helps us to understand your request better. Once we have the necessary information from you and your request is valid, we will respond to you within one month (45 days for California Consumer Privacy Requests) of the receipt of a request unless the number and complexity of the requests made is deemed sufficiently high, in which case we may extend this time by a maximum of further two months (45 days for California Consumer Privacy Requests). We will inform you if we need to make use of this additional time and why we need to do so as soon as is practicably possible.

These rights are not absolute and we will let you know if we determine that there is a legal basis preventing us from honouring your request.

What personal data do we collect about you and how do we collect it?

The personal data we collect (also known as PII), how we collect it, how we will use it and who we will share it with will depend upon a number of factors including, but not limited to:

- whether you are a prospective, current or former employee, contractor, worker, director or officer;
- if you have opted to take an international secondment within the Aspen Group; and
- which optional reward benefits you have selected, connected with your employment and as listed on the Aspen Benefits intranet site.

We may collect information from you or your representative, including agents and brokers, that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you. In particular, we may collect some or all of the following categories of personal information:

- Identifiers such as name, alias, address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license or state identification card number, passport number, signature, physical characteristics or description, insurance policy information, financial information, medical information or other similar identifiers or personal information categories.
- Protected classification characteristics (SPII) such as age, race, ethnicity, ancestry, national origin, citizenship, political opinions, religious or philosophical beliefs, trade union membership, marital status, medical condition, disability, sex (including gender, gender identity, gender expression, pregnancy/childbirth and related medical conditions), sexual orientation, veteran or military status, biometric or genetic information and criminal convictions.
- Commercial information, including records of products or services purchased, obtained or considered, or other purchasing or consuming histories or tendencies.
- Biometric information.
- Internet or other electronic network activity regarding your interaction with our Internet Web site, application or advertisement.
- Geolocation data.
- Audio, electronic, visual, thermal, olfactory or similar information.
- Professional or employment-related information.
- Educational information.
- Inferences drawn from any of the information identified above.

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We may also share this information with Third Party Suppliers for a legal business purpose as described later in this notice.

We collect PII about you through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties, including former employers, referees, and other background check agencies or through information that is available in the public domain. In the US, please note that, in addition to this Statement, you may receive additional notices relating to background and credit check processes.

We will collect additional personal information in the course of job-related activities throughout the period of you working for us, and occasionally following the termination of your relationship with us.

Should you provide personal information to us about other individuals (for example, family members who are benefits recipients or beneficiaries) you should refer them to this Notice before supplying us with their data on their behalf.

Why do we ask for this information?

All of the information you provide during the recruitment process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements, if necessary. We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role for which you have applied.

In the event that you are offered and accept a role with Aspen, the information we collect about you will be used for the following purposes:

- administering and maintaining HR records (including but not limited to information relevant to induction, on-boarding and leaver processes);
- planning, paying and reviewing your salary or fees, other remuneration and benefits;
- assessments of your performance or conduct including performance appraisals and reviews and for the purposes of disciplinary, grievance, whistleblowing and other internal procedures;
- planning, delivering or arranging training courses related to your role and/or continued professional development, including providing information to external training providers;
- maintaining sickness and other absence records;
- maintaining health and safety records and ensuring a safe working environment;
- taking decisions on your fitness to work and complying with our obligations under applicable laws and regulations, including employment equality or fair employment legislation in your jurisdiction; providing references and information to future employers;
- alumni relations;
- providing information to relevant external authorities for tax, social security and other purposes as legally required;

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- equal opportunities monitoring;
- monitoring IT usage, including in connection with an investigation or employment disciplinary action, monitoring building access; allowing and removing access to data systems;
- providing information to any future purchasers of Aspen or parts of its business, including but not limited to due diligence purposes; and
- planning or reviewing options, in relation to the operation or management of Aspen.

For the avoidance of doubt, PII (including Special Category Data) will be processed in a manner consistent with any Aspen Group equal opportunities policy in place from time to time.

Where appropriate, and subject to applicable local law, we may collect information about criminal convictions as part of the recruitment process and subsequently as part of periodic background screening checks commensurate with your duties and responsibilities, or we may be notified of such information directly by you in the course of you working for us. Therefore, we envisage that we may hold information about unspent criminal convictions. We will use information about criminal convictions and offences for the following purposes, subject to applicable local law:

- to make decisions about your recruitment and/or continued employment;
- in determining your ability to perform a role and the department or environment in which you work; or
- in complying with our regulatory reporting obligations or with our professional obligations to clients.

Less commonly, subject to applicable local law, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

What is the legal basis for processing your data?

Under current legislation for any Aspen jurisdiction other than Australia or Singapore, Aspen may collect, store, transfer and process data under a number of different bases. These bases are explained, in summary, in the table below; please note that other locally permissible legal basis of processing are available but which are not required to be detailed in the table. If you have any queries please contact the Group Data Privacy Officer via email at dpo@aspen.co.

Basis	Description	Example
Legal Obligation (inc. Employment Law)	Aspen can rely on this lawful basis if we need to process the personal data to comply with a common law or statutory obligation.	Aspen needs to process personal data to comply with its legal obligation to disclose employee salary details to the applicable tax and social security authorities.
Performance of a Contract	Aspen can rely on this lawful basis for processing if it needs to process an individual's personal data to fulfil its contractual obligations to them; or because they have asked Aspen to do something before entering into a contract. The processing must always be necessary.	Aspen needs to process personal data to fulfil fundamental contractual obligations such as paying individuals or monitoring attendance.

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Legitimate Interest¹	Aspen can rely on this lawful basis if the processing is necessary for Aspen's legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.	It is in Aspen's legitimate interests to ensure that individuals are fit and proper and meet the requirements for the role they have been hired to perform. This includes pre-employment or pre-engagement screening checks e.g. criminal record check, employment history checks, credit/compliance checks.
Vital Interest	Aspen can rely on this lawful basis if the processing is necessary to protect someone's life.	An individual employed by, or providing services to, Aspen is admitted to the emergency department of a hospital with life-threatening symptoms during working hours. The disclosure to the hospital of the individual's personal data (including name and any known medical condition) is necessary in order to protect his/her vital interests.
Legal Claim	Aspen can rely on this lawful basis if the processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.	Aspen may need to litigate in certain situations to protect its legal position, brand and reputation.
Explicit Consent	<p>Consent is a further lawful basis for processing, and explicit consent can also legitimise the processing of Special Category Data. Consent may also be relevant where the individual has exercised their right to restriction, and explicit consent can legitimise automated decision-making and overseas transfers of data. Consent should be obvious and require a positive action to opt in. Consent requests must be prominent, unbundled from other terms and conditions, concise and easy to understand, and user-friendly.</p> <p>Please note that, in the event Aspen seeks your consent, we will provide you with full details of the information that we would like and the reason we need it so that you can carefully consider whether you wish to consent. We will also inform you about the fact that you can revoke your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal and how you should do that. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us and you will not be subject to disciplinary action for withholding your consent.</p>	Consent will be requested when Aspen processes certain benefits, which require the processing of Special Category Data.

¹ Please note this legal basis does not currently apply in Australia or Singapore.

We do not need your consent if we use your PII (including Special Category Data) to carry out our legal obligations or to exercise specific rights in the field of employment law. In very limited circumstances, and where applicable, we may approach you for your written consent to allow us to process Special Category Data. Please see the "Explicit Consent" category above for further details.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

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We will only use your PII for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your PII for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

If you are in Australia, the legal bases referred to above do not apply, and we will only collect your personal information in Australia if it is reasonably necessary for, or directly related to, one of our functions or activities. We will seek your consent before collecting any sensitive information about you. We may use or disclose the personal information we collect about you for one or more of the purposes described in this Statement, or for any related purpose if we believe you would reasonably expect us to use or disclose your personal information for that purpose. We may also use and disclose your personal information with your consent, or where we are otherwise required or permitted by Australian law to do so.

What will we do with the information you provide to us?

As required by applicable data protection and privacy law, Aspen has security procedures regarding the storage and disclosure of personal data. In the course of your application process or employment or engagement with us, Aspen may engage a number of Third Party Suppliers and may disclose your personal data to those suppliers in connection with services provided by them.

At all times, Aspen will require that the personal data is processed in accordance with our instructions and in circumstances which require the recipient to observe industry standard security measures in respect of personal data. We do not allow our Third Party Suppliers to use your personal data for their own purpose.

Aspen may also be under a duty to disclose or share your personal data in order to comply with a legal or regulatory obligation, where such disclosure is required by applicable tax or social security authorities, the U.S. Securities and Exchange Commission (SEC), the Financial Conduct Authority (FCA), the Prudential Regulation Authority (PRA), the Bermuda Monetary Authority (BMA) or another similar regulatory body, the police or a court of competent jurisdiction.

We may share your personal information with other entities within the Aspen Group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, or for system maintenance support and hosting of data.

We may also share your personal information with other third parties, for example, in the context of a possible sale or restructuring of the business or a part of the business. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes, subject to any legal or regulatory obligation where such data cannot be anonymised. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

Aspen will not sell, disclose or transfer personal data about you to third parties (including Third Party Suppliers) for the purposes of marketing.

The personal data that we collect about you may be transferred to, and stored at, one or more

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countries outside the EEA or outside the jurisdiction in which you reside. It may also be processed by staff operating outside the EEA (or outside the jurisdiction in which you reside) who work for Aspen or for our Third Party Suppliers. In such cases, Aspen will take appropriate steps to ensure an adequate level of data protection in the country of the recipient as required under the GDPR (or as required under local laws in your jurisdiction) and as described in this Statement. You can obtain information and a copy of documentation pertaining to these safeguards from Aspen's Data Protection Officer where applicable. If Aspen cannot ensure such an adequate level of data protection, your personal data will only be transferred outside the EEA (or outside the jurisdiction in which you reside) if you have given your prior consent to such transfer and any local law requirements for the transfer have been satisfied.

Aspen employee data is currently processed in Germany and the Netherlands where Aspen's HR database (Success Factors) is located, as well as in Aspen's operating jurisdictions, including the UK, US, Bermuda, Ireland, Dubai, Singapore, Switzerland and Australia.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

Further information regarding how we use employee data is included in the Aspen Employee Handbook.

A detailed breakdown of the uses, legal bases for processing and third parties with whom we might share data is available upon request from the Aspen Group Data Privacy officer via email at dpo@aspen.co

How long is the information retained for?

The length of time for which your data will be retained will depend on a number of factors, including but not limited to:

- legislative requirements;
- Aspen reporting requirements; and
- operational requirements (e.g. pension payment processing).

Aspen seeks to minimize the time it retains data in line with the requirements of the GDPR or any local laws that apply in your jurisdiction, and maintains a comprehensive Group Records Retention Policy in order to achieve this aim. This policy can be obtained from Aspen's Group Data Privacy Officer at dpo@aspen.co.

The data retention periods associated with employment data for each jurisdiction are summarised in below schedules.

[HR Retention Schedule – Australia](#)

[HR Retention Schedule – Bermuda](#)

[HR Retention Schedule – Dubai](#)

[HR Retention Schedule – Ireland](#)

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[HR Retention Schedule – Singapore](#)

[HR Retention Schedule – Switzerland](#)

[HR Retention Schedule – UK](#)

[HR Retention Schedule - US](#)

Changes to this Statement or to your PII

Aspen reserves the right to change this Statement and any other relevant policies or procedures at any time without notice to you. Any changes we may make to this Statement in the future will be posted on Aspen's web site and you are advised to regularly check and review the Statement to ensure you understand how we may be processing your personal data. Any changes Aspen may make to this Statement (which will, unless otherwise indicated, apply to any personal data already obtained by Aspen before the changes were made) will be effective from the date on which those changes have been posted on this page. Where appropriate, Aspen may also notify you of any changes made by e-mail.

It is important that the personal information we hold about you is accurate and current. Please keep us informed of any changes to your personal information during your working relationship with us.

This Statement was last updated on 10 December 2019.

Complaints or queries

For the purposes of the data protection legislation, the company responsible for your PII (i.e. the data controller) is the Aspen Group company stated in your contract of employment, letter of engagement or assignment letter. The relevant data controller's contact details can also be found in your contract of employment, letter of engagement or assignment letter. If you have any questions on the Statement, please contact Aspen's Group Data Protection Officer at Plantation Place, 30 Fenchurch Street, London, EC3M 3BD or via email at dpo@aspen.co.

Where you are dissatisfied with any aspect of our handling of your personal data, you have a right to lodge a complaint with the relevant authority responsible for data protection in your jurisdiction. For details of the relevant authority in your jurisdiction, please click [here](#).

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Definitions used in this Statement

"Aspen" means the Aspen entity which employs you.

"Aspen Group" means Aspen Insurance Holdings Limited and its subsidiaries and subsidiary undertakings, and any holding company or parent undertaking of the Company and all other subsidiaries and subsidiary undertakings of any holding company or parent undertaking of the Company, in each case, as at the date of this Statement, where "holding company", "parent undertaking", "subsidiary" and "subsidiary undertaking" have the meanings given to them in the UK Companies Act 2006.

"EEA" means European Economic Area

"GDPR" means the General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, as amended or updated from time to time.

"PII" means personally identifiable information.

"Special Category Data" means personal data that reveals:

- racial or ethnic origin;
- political opinions;
- religious and philosophical beliefs;
- trade union membership;
- genetic data;
- biometric data;
- health data;
- sex life and sexual orientation.

"Statement" means the Global Privacy Statement for personnel of the Aspen Group

"Third Party Suppliers" means third party service providers (including contractors and designated agents).