



Privacy Policy

Frontier Global Underwriting

Overview

Frontier Global UW Limited and Frontier Global UW (Australia) Pty Ltd (collectively, **Frontier Global Underwriting**) is committed to protecting your privacy in accordance with:

the *Privacy Act 1988* (Cth) (**Privacy Act**), which includes the Australian Privacy Principles (**APPs**) and any related privacy codes;

the Data Protection Act 2018 and United Kingdom (**UK**) General Data Protection Regulation (**UK GDPR**)(collectively, the **UK Privacy Law**); and

any other country-specific data protection regulations and other applicable to Frontier Global Underwriting.

Where we refer to “personal information” in this Policy, we are referring to any information that is personal information under the Privacy Act or personal data under the UK Privacy Law.

This Policy outlines how we collect, use, disclose and store your personal information and lets you know how you can exercise your rights to that information.

This Policy applies to our obligations when handling information in Australia and in the UK. We have set out in this policy where there are differences between the Privacy Act and the UK Privacy Law.

Please read this Policy carefully and contact us using the relevant details below if you have questions.

What personal information to do we collect and why do we collect it?

Information Collected	Why we process it	How we collect it	Legal basis for processing (UK individuals only)
About individuals who make claims under a policy			
<ul style="list-style-type: none"> Your name, email address, phone number and postal address. Date of birth. Gender. Your nationality and which countries you hold citizenship of. Employment details. 	<ul style="list-style-type: none"> For the purpose of providing our insurance services to you, our insureds, or other third party insured, assessing risk, amending or renewing an insurance policy, or when we are processing a claim. 	Directly from you when you: <ul style="list-style-type: none"> provide it to us; interact or share personal information with us via our website and social media; and communicate with us. 	The applicable legal basis will depend on the circumstances of our dealing with you. <ul style="list-style-type: none"> Your consent to processing your personal data for that purpose. The processing is necessary for compliance with a legal obligation that we or another data



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<ul style="list-style-type: none"> • CV (for Directors and Officers insurance). • Your device ID, device type and information, geo-location information, Internet Protocol (IP) address, standard web log information browser session data, device and network information, statistics on page views, acquisition sources, search queries, browsing behaviour and information gathered through internet cookies. • Information contained in any communications between you and us. • Any other information that is relevant to the claim or relevant to facilitating the policy for our insured. 	<ul style="list-style-type: none"> • To identify and interact with you. • To perform administrative and operational functions. • To comply with any legal requirements, including any purpose authorised or required by an applicable law, court or tribunal. • For any other purpose for which you give your consent. 	<p>Indirectly from a third party such as an insurance intermediary, your employer or policyholder.</p>	<p>controller are subject to.</p> <ul style="list-style-type: none"> • The processing is necessary to pursue our legitimate interests in providing our services to you, our policyholders and insureds, or the legitimate interests of the data controller or of a third party, such as to seek and use our services or to provide our services to our insureds.
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About individuals who interact with us

<ul style="list-style-type: none"> • Your name, email address, phone number and postal address. • Date of birth. • Gender. • Your nationality and which countries you hold citizenship of. • Employment details. 	<ul style="list-style-type: none"> • For the purpose of providing our insurance services to you, our insureds, or other third party insured, assessing risk, amending or renewing an insurance policy with us, or when we are processing a claim. • To identify and interact with you. 	<p>Directly from you when you:</p> <ul style="list-style-type: none"> • provide it to us; • interact or share personal information with us via our website and social media; and • communicate with us. 	<p>The applicable legal basis will depend on the circumstances of our dealing with you.</p> <ul style="list-style-type: none"> • Your consent to processing your personal data for that purpose. • The processing is necessary for compliance with a legal obligation that we or another data controller are subject to.
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<ul style="list-style-type: none"> • Details of your enquiry. • Your device ID, device type and information, geo-location information, Internet Protocol (IP) address, standard web log information browser session data, device and network information, statistics on page views, acquisition sources, search queries, browsing behaviour and information gathered through internet cookies. • Information about your access and use of our website, including browser session data, device and network information, statistics on page views, acquisition sources, search queries, browsing behaviour and information gathered through internet cookies. 	<ul style="list-style-type: none"> • To perform administrative and operational functions. • To comply with any legal requirements, including any purpose authorised or required by an applicable law, court or tribunal. <p>For any other purpose for which you give your consent.</p>		<ul style="list-style-type: none"> • The processing is necessary to pursue our legitimate interests such as to provide our services to you or our policyholders and insureds, the legitimate interests of the data controller, or of a third party such as to seek and use our services or to provide our services to insureds.
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About contractors or prospective staff members

<ul style="list-style-type: none"> • Your name, email address and phone number. • Your nationality and which countries you hold citizenship of. • Educational details, such as schools you have attended, any qualifications you have received, transcripts and/or 	<ul style="list-style-type: none"> • To enable us to carry out our recruitment functions. • To correspond with you. • To fulfil the terms of any contractual relationship. • To ensure that you can perform your duties. 	<p>Directly from you when you:</p> <ul style="list-style-type: none"> • provide it to us; • interact or share personal information with us via our platforms and social media; and • communicate with us. 	<ul style="list-style-type: none"> • Your consent to processing your personal data for that purpose. • The processing is necessary for compliance with a legal obligation that we or another data controller are subject to. • The process is necessary to pursue our
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English language test results. <ul style="list-style-type: none">• Employment details, such as a CV, qualifications attained or examples of work.			legitimate interests, such as for our business operations and to manage our employment relationship with you.
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We will only use or disclose your personal information for the purposes for which we advised you we were collecting it for as noted in this Policy.

We sometimes receive unsolicited personal information. In circumstances where we receive unsolicited personal information we will usually destroy or de-identify the information as soon as practicable if it is lawful and reasonable to do so unless the unsolicited personal information is reasonably necessary for, or directly related to, our functions or activities.

Sensitive information

For the purposes of the law, some information we process about you may be considered sensitive information under the Privacy Act or special category data under the UK Privacy Law and therefore subject to greater protection. The sensitive information we may collect and process includes racial or ethnic origin, religious beliefs or affiliations, sexual orientation or practices, criminal record, health information or any other sensitive information we need for the purpose we are collecting it for.

If we process sensitive information about you, we will only disclose or use that information with your consent or if another exception applies under the Privacy Act or the UK Privacy Law (as applicable).

Consent (UK individuals only)

Where we rely on your consent as the lawful basis to process your personal information under the UK Privacy Law we will always ask for you to positively affirm your acceptance.

Where consent is given it is just as easily able to be withdrawn by contacting us at the details provided below.

If you believe that consent has not been given freely or in breach of the terms of this Privacy Notice, please contact us.

If we can't collect your personal information or if you would like to remain anonymous or use a pseudonym

If you do not provide us with the personal information described above, or seek to remain anonymous or use a pseudonym in your dealings with us, some or all of the following may happen:

we may not be able to provide our insurances services to you, assess a claim, assist you with your query, either to the same standard or at all; and/or we may not be able to provide you with information about services that you may want.



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Disclosing your personal information

We may disclose your personal information to the following third parties:

our related bodies corporate in the Frontier Global Underwriting group of companies;

the policyholder (where the insured person is not the policyholder);

intermediaries and service providers engaged by you (such as current or previous brokers);

our business or commercial partners;

our professional advisers, dealers and agents;

third parties and contractors who provide services to us, including customer enquiries and support services, IT service providers, data storage, webhosting and server providers, marketing and advertising organisations, payment processing service providers;

payment system operators and debt-recovery functions;

third parties to collect and process data, such as our email and cloud storage platforms, website provider, video conferencing providers, and any other service providers we use from time to time; and

any third parties authorised by you to receive information held by us.

If you are a contractor, we may disclose your information to payment system operators and debt-recovery functions.

In the event we participate in a merger, acquisition, or sale of assets we may disclose personal information collected by us to such entities that we propose to merge with or be acquired by and will assume the rights and obligations regarding your personal information as described in this Policy.

We may also disclose your personal information if we are required, authorised or permitted by an applicable law.

International Transfer and disclosure of personal information

We may send information to the Frontier Global Underwriting group of companies and third parties that are located outside of Australia and the UK for the purposes of providing our services. These third parties are located in the European Union, although this list may change from time to time. Disclosure is made to the extent that it is necessary to perform our functions or activities.

Where we transfer personal information from within to outside of the UK, we ensure an adequate level of protection for the rights of individuals based on the adequacy of the receiving country's data protection laws by using the applicable appropriate safeguards under the UK Privacy Law.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.



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Using your personal information for direct marketing (Australian individuals only)

From time to time, and in support of our future development and growth, we may use your personal information to contact you to promote and market our services.

You can opt-out from being contacted for direct marketing purposes by contacting us using the contact details below or by using the unsubscribe facility included in each direct marketing communication we send. Once we receive a request to opt out from receiving marketing information, we will stop sending such information within a reasonable amount of time.

Using your personal information for direct marketing (UK individuals only)

Where we use your data for direct marketing, we will ensure that it is in compliance with the UK Privacy Law.

We will always provide you with a simple means of withdrawing your consent to us processing your personal information for direct marketing purposes. Once we receive a request to opt out from receiving marketing information, we will stop sending such information within a reasonable amount of time.

Security

We apply and maintain appropriate technical and organisational measures to protect personal information under our control from misuse, interference, and loss and from unauthorised access, modification or disclosure.

We protect the personal information we hold through a number of different layers such as encryption and Multi-Factor Authentication. While we take reasonable steps to ensure your personal information is protected from loss, misuse and unauthorised access, modification or disclosure, security measures over the internet can never be guaranteed.

We encourage you to play an important role in keeping your personal information secure, by maintaining the confidentiality of any passwords and account details used on our website.

Your rights (Australian individuals only)

If you would like to access your personal information, please contact us using the details below. In certain circumstances, we may not be able to give you access to your personal information, in which case we will write to you to explain why we cannot comply with your request.

We try to ensure any personal information we hold about you is accurate, up-to-date, complete and relevant. If you believe the personal information we hold about you should be updated, please contact us using the details below and we will take reasonable steps to ensure it is corrected if appropriate.

Your rights (UK individuals only)

Overview

The UK GDPR provides you with eight key rights, being the right to:



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Be informed: anyone processing your data must make clear what they are processing, why and who else the data may be passed to.

Access: the right to access what data is held about you.

Rectification: the right to have your data corrected or amended if what is held is incorrect.

Erasure: the right to ask for your personal data to be deleted, also known as the right to be forgotten, if permitted under applicable laws.

Restrict processing: the right to require a temporary halt to the processing of personal data.

Data portability: the right to request for any data supplied by you to us to be provided in a structured, commonly used and machine-readable format.

Object: the right to object to further processing of your data which is inconsistent with the primary purpose for which it was collected.

Consider automated decision making and profiling: the right not to be subject to a decision based solely on automated processing.

Managing your personal information

Subject to the UK GDPR you may request to access the personal information we hold about you by contacting us. All requests for access will be processed within a reasonable time. Please contact us to exercise your rights as set out below.

Accessing or rectifying your personal information

We will, on your request provide you with access to your personal information, or correct, delete, or modify the personal information you provided to us. You can find out more about how to do this by contacting us.

Deletion

We keep data for as long as it is needed for our operations. If you wish to have us delete your personal information, please contact us.

Object, restrict or withdraw consent

Where we have processed your personal information based on your consent, you may submit a request to us if you object to any personal information being stored, or if you wish to restrict or withdraw any consent given for the collection of your personal information.

You may withdraw your consent to the processing of all your personal information at any time. If you wish to exercise this right, you may do so by contacting us.

Portability

We may, if required and possible, provide you with the means to download the information you have shared with us.

Automated decision making, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you, or similarly significantly affects you, as long as the decision is not necessary for entering into, or the performance of, a contract between us, or is not authorised under applicable laws and which also lays down suitable measures to



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safeguard your rights and freedoms and legitimate interests, or is not based on your explicit consent. We do not use automated decision making or profiling to make decisions about you.

In certain instances, we may not be required or able to provide you with access to your personal information. If this occurs, we will give you reasons for our decision not to provide you with such access to your personal information in accordance with the requirements of the UK Privacy Laws.

There is no application fee for making a request to access your personal information. However, we may charge a reasonable administrative fee for the provision of information in certain circumstances, such as if you make manifestly unfounded or excessive requests, or if you require further copies of your personal information.

Where we act as a data processor, we do so on behalf of the data controller and in accordance with their instructions. This means that should you wish to access, review, correct, transfer, modify or delete any personal information we process on behalf of the data controller, you should contact the data controller with your request.

Integrity and Retention of Data

We destroy or de-identify personal information when we no longer need it unless we are otherwise required or authorised by law to retain the information.

We take all reasonable steps to ensure that the personal information we collect about you is accurate, up to date and complete. Where we collect that information from you directly, we rely on you to supply accurate information. Where we use or disclose your personal information, we will also ensure that your personal information is relevant.

Unless required by law, we will retain your personal information for the period necessary to fulfil the purposes outlined in this Policy, or where inactive, 7 years, upon which we will securely delete your information.

We may retain your information for fraud prevention or similar purposes.

Cookies

What are cookies?

A cookie is a small piece of text sent to your browser by a website that you visit. It helps the website to remember information about your visit, like your preferred language and other settings. That can make your next visit to our website more useful to you, for example.

Use of cookies

Frontier Global Underwriting's online services, such as our website, online services and advertisements, may use "cookies". Cookies help us better understand user behaviour, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches.

We treat information collected by cookies as non-personal information. However, to the extent that Internet Protocol addresses or similar identifiers are considered personal information by local law, we treat these identifiers as personal information. Similarly, to the extent that non-personal information is combined with personal



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information, we treat the combined information as personal information for the purposes of this Policy.

Frontier Global and our partners also use cookies and other technologies to remember personal information when you use our services. Our goal in these cases is to make your experience with Frontier Global more convenient and personal.

How to manage cookies

Some people prefer not to allow cookies, which is why most browsers give you the ability to manage cookies to suit you. If you want to disable cookies, check with your web browser to find out how to disable cookies. Please note that certain features of the Frontier Global's services may not be available once cookies are disabled.

Changes

We may amend this Policy from time to time. Not all changes to our Policy require your consent. We will notify you of any change to our information handling that requires your consent before being implemented.

Making a complaint

If you believe your privacy has been breached or you have a complaint about our handling of your personal information, you can contact us using the details below or make a complaint to the relevant authority.

We take privacy complaints seriously. If you make a complaint, we will respond within 5 days to acknowledge your complaint. We will try to resolve your complaint within 30 days. When this is not reasonably possible, we will contact you within that time to let you know how long we will take to resolve your complaint.

We will investigate your complaint and write to you to explain our decision as soon as practicable. If you are not satisfied with our decision, you can refer your complaint to:

if you reside in Australia, the Office of the Australian Information Commissioner by phone on 1300 363 992 or online at www.oaic.gov.au; or

if you reside in the UK, the Information Commissioner's Office + 44 (0)30 3123 1113 or online at ico.org.uk/make-a-complaint/.

Contact us

If you reside in Australia, all questions or queries about this Policy and complaints should be directed to:

Privacy Officer

Address: Level 11, 309 Kent Street

Sydney, NSW 2000

Australia

Email: privacy@frontierglobaluw.com

If you reside in the UK, the details of the data controller that is responsible for your personal information and our Data Protection Officer are below:

Frontier Global UW Limited

Data Protection Officer



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Phone: +44 (0)20 8049 8316

Address: Suite 212, 2nd Floor, 70 Gracechurch Street,

London EC3V 0HR

United Kingdom

Email: privacy@frontierglobaluw.com

This Policy was last updated in May 2024.