

Gallagher Privacy Notice for Sweden

We are committed to ensuring your privacy is protected. This Privacy Notice sets out details of the information that we may collect from you and how we may use that information. Please take your time to read this Privacy Notice carefully. When using our website, this Privacy Notice should be read alongside the website terms and conditions.

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About us

This Privacy Notice describes how Gallagher Swedish entities (including Nordic Försäkring & Riskhantering AB, Proinova AB/Proinova Agency AB and Arthur J Gallagher Sweden AB) (including when conducting business using any of their respective trading names which can be found by clicking here) "**we**" or "**us**" or "**our**" or "**Gallagher**" collect and process data about individuals. Our services consist primarily of risk consulting, (re)insurance broking and the

provision of insurance, which enable the consideration of, access to, administration of, and making of claims on, insurance. We are part of the Arthur J. Gallagher global group of companies.

In order to offer to and provide our services, we will collect and use data about individuals. This means that we are a 'data controller' and we are responsible for complying with data protection laws.

During the insurance lifecycle we will receive personal information relating to potential or actual policy holders, policy beneficiaries including their family members as well as claimants and other parties that are involved in a claim. As such, references to “**individuals**” or “**you**” or “**your**” in this Privacy Notice include any living individual from the preceding list, whose personal information we receive in connection with the services we provide under our engagement with our clients.

We have a Data Protection Office to oversee our handling of personal information. If you have any questions about how we collect, store or use your personal information, you may contact our Data Protection Office using the details set out in the "Contacting Us" section.

[About the insurance market](#)

The personal information that we collect and process will be shared with other participants in the insurance market, some of which you will not have direct contact with. You can identify relevant data controllers through the insurance market life-cycle in the following ways:

- **Where you took out the insurance policy yourself:** intermediaries such as Gallagher will be the initial data controller. The insurer will also be a data controller. Gallagher's Data Protection Office can advise you of the identities of other insurance market participants that have been provided with your personal data.
- **Where your employer or another organisation took out the policy for your benefit:** you should contact your employer or the organisation that took out the policy, who should provide you with details of intermediaries such as Gallagher that they provided your personal data to. Gallagher's Data Protection Office can advise you of the identities of other insurance market participants that have been provided with your personal data.
- **Where you are not a policyholder or an insured:** you should contact the organisation that collected your personal data who should provide you with details of the relevant data protection contact.

The personal information that we collect will depend on our relationship with you. Please click on the section below that best describes your relationship with us. For example, we will collect more detailed information about you if you are a client than we would if you simply made an enquiry about the services that we offer.

Sometimes we will ask for or obtain special categories of information (information relating to your health, genetic or biometric data, criminal convictions, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership) because it is relevant to your insurance policy or claim (for example, health information which relates to an accident policy) or information regarding criminal convictions for the purposes of preventing, detecting and investigating fraud but only to the extent permitted by applicable local law.

If you provide personal information to us about other people you must provide them with a copy of this Privacy Notice and obtain any consent where we indicate that it is required for the processing of that person's information in accordance with this Privacy Notice.

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3.8.3. What will we use your personal information for?

3.8.4. Who will we share your personal information with?

3.1 Prospective customers or parties covered under an insurance policy we are asked to quote on

This section will detail what personal information we collect about you and use if you are a prospective customer or you have submitted your personal information so that we can provide you with a quote for the placing of an insurance policy or if you are a party and would be covered under an insurance policy we will be placing.

3.1.1. What personal information might we collect?

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3.1.3. How will we collect your personal information?

3.1.4. What will we use your personal information for?

3.1.5. Who will we share your personal information with?

3.1.1. What personal information might we collect?

- General information such as your name, date of birth, gender, relationship to the customer (where are you not the prospective policyholder), identification information such as national identification number, passport number or driving licence number
- Contact details including address, telephone number and email address
- Information about your job including job title, business description, education, employment history and professional certifications
- Information relating to the advice that you request or the services that we are providing. For example, we might need information relating to your previous insurance policies and claims history in order to advise on your future needs
- Financial information such as your financial history and needs, income, bank details, payment details and information obtained as a result of our credit checks
- Information obtained when we carry out checks of sanction lists
- Information obtained through our use of cookies. Please see our cookies policy for more information
- Information captured during recordings of our telephone calls
- Your marketing preferences
- Any information we record about your preferences when doing business with us

3.1.2. What special categories of information might we collect?

- Details of your current or former physical or mental health – for example details about a medical claim you made under a previous travel policy when you provide details of your claims history or details about your current health because it is relevant to the insurance policy you want Gallagher to place
- Information relating to criminal sanctions (including offences and alleged offences and any caution, court sentence or criminal conviction). We may receive this information as a result of carrying out checks of sanctions lists Gallagher may only collect and process information to criminal sanctions to the extent permitted by local law
- Information relating to any professional disciplinary action that you are or have been the subject of
- Your political opinions, religious or philosophical beliefs or trade union membership

3.1.3. How will we collect your personal information?

We may collect your information in a number of different ways:

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- Directly from you or from someone else on your behalf in a number of ways including where it is submitted through our website or in application forms, initial disclosure documents, through interactions with our website and more generally during any forms of communication such as face to face, written and telephone correspondence
- From third parties and other insurance market participants who might introduce customers to us such as another broker and insurers
- Via publically available sources such as internet search engines, open electoral registers and social media sites
- From other companies within the Arthur J. Gallagher group
- Through customer satisfaction surveys and market research
- From credit reference agencies
- Via insurance industry fraud prevention and detection databases and sanctions screening tools
- From government agencies such as the Swedish Transport Agency (“Transportstyrelsen”) or Tax Authorities (“Skatteverket”) and from professional regulators
- Selected third parties who provide us with details of potential customers

3.1.4. What will we use your personal information for?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We need to use your personal information to enter into or perform our contract with you, for example, in order to fulfil our obligations under our contract and place appropriate insurance cover, we need to use your personal information to provide you with a quote and determine market placement.
- We have a legitimate business interest to use your personal information such as maintaining our business records, keeping records of insurance policies we place and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm
- We have a legal or regulatory obligation to use your personal information. For example, our regulators impose certain record-keeping rules which we must adhere to

When the information that we process is classed as a special category of information, we must have one of the following additional legal grounds for such processing:

- It is necessary for compliance with a legal obligation or it is in the substantial public interest. This will apply where we are undertaking any activities to prevent and detect fraud.
- You have provided your consent. There may be some circumstances that without your consent to use your special categories of information we would be unable to arrange your

insurance cover. We will notify you when this will be applicable and why your consent is necessary.

- Where the use of your special categories of information is necessary to establish, exercise or defend legal claims, for example legal proceedings are being brought against us or we want to bring a legal claim ourselves.

Please see below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
To evaluate your insurance needs and risk appetite, match those to appropriate insurer, policy and premium and obtain quotes for you	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a legitimate business interest (to determine market placement and place insurance cover for you that is in line with your insurance needs) 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims • Your consent
To set you up as a customer including carrying out fraud, sanctions, credit and anti-money laundering checks	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a legitimate business interest (to carry out appropriate credit checks and fraud checks) • We have a legal or regulatory obligation 	<ul style="list-style-type: none"> • The prevention and detection of fraud is in the substantial public interest • It is necessary to establish, exercise or defend legal claims • Your consent
General client care, communicating with you and responding to any enquiries you have	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a legal or regulatory obligation • We have a legitimate business interest (to respond to our prospective customers and keep them updated on any future placing of insurance cover) 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims
To assist you in the arrangement of premium finance for your policy	<ul style="list-style-type: none"> • Your consent 	<ul style="list-style-type: none"> • Not applicable
Complying with our legal or regulatory obligations (such as our requirements to report to the FSA)	<ul style="list-style-type: none"> • We have a legal or regulatory obligation 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims
Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers)	<ul style="list-style-type: none"> • We have a legitimate business interest (to continually improve our services) 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
Managing our business operations such as maintaining accounting records, analysing financial results, complying with internal audit requirements and receiving professional advice (e.g. tax or legal advice)	<ul style="list-style-type: none"> We have a legitimate business interest (to carry out business operations and activities that are necessary for the everyday running of a business) 	Not applicable
Monitoring applications, reviewing, assessing, tailoring and improving our products and services and similar products and services offered by Gallagher	<ul style="list-style-type: none"> We have a legitimate business interest (to market our services) 	Not applicable
Monitoring usage of any of the various Gallagher websites	<ul style="list-style-type: none"> We have a legitimate business interest (to assess usage of our website) 	Not applicable
Advertising, marketing, and promotional purposes, including to reach you by email, post or telephone with more relevant advertisements and to evaluate, measure and improve the effectiveness of our advertising campaigns; to send you newsletters, offers or other information we think may interest you; to contact you about our services or information we think may interest you; and to administer promotions.	<ul style="list-style-type: none"> With your consent, or based on a legitimate business interest or as otherwise permitted by law 	Not applicable
Advising, improving or developing products and services through risk modelling and data analysis, e.g. understanding risk exposures, crafting solutions with appropriate insurance coverage, limits, deductibles based on historical datasets	<ul style="list-style-type: none"> We have a legitimate business interest (to improve and develop products and services by drawing on our experience with ongoing and prior relationships) 	Not applicable

3.1.5. Who will we share your personal information with?

We may share your personal information with companies in the Arthur J. Gallagher group to serve you, including for the activities listed above.

We may share personal information with the following third parties for the purposes set out above:

- our insurance partners such as other insurance intermediaries, insurers, reinsurers or other companies who act as insurance distributors
- other brokers who act directly for you and who have approached us to facilitate the placement of an insurance policy for you
- other third parties who assist in the administration of insurance policies such as accountants, auditors, lawyers and other experts
- insurance broking platform providers
- fraud detection agencies and other third parties who operate and maintain fraud detection registers
- our regulators
- the police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime
- other insurers who provide our own insurance
- industry bodies
- credit reference agencies
- our third party services providers such as IT suppliers, finance and payment providers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers and insurance software providers
- selected third parties in connection with the sale, transfer or disposal of our business

If you would like further information regarding the disclosures of your personal information, please see the "Contacting us" section below for our contact details.

3.2 Customers or parties covered under an insurance policy we place

This section will detail what personal information we collect about you and use if you are a customer or an individual covered by an insurance policy we have placed.

3.2.1. What personal information might we collect?

3.2.2. What special categories of information might we collect?

3.2.3. How will we collect your personal information?

3.2.4. What will we use your personal information for?

3.2.5. Who will we share your personal information with?

3.2.1. What personal information might we collect?

- General information such as your name, date of birth, gender, relationship to the customer (where you are not the prospective policyholder), identification information such as national identification number, passport number or driving license number
- Contact details including address, telephone number and email address
- Information about your job including job title, business description, education, employment history and professional certifications
- Information relating to the advice that you request or the services that we are providing. For example, we might need information relating to your previous insurance policies and claims history
- Information which is relevant to the insurance policy we have placed or any claims made under it. For example where we have placed property insurance for you, we will hold information about your property and the individuals living there
- Information obtained from requests for mid-term adjustments which may reveal changes in your personal circumstances which are relevant to the insurance policy we placed
- Financial information such as your financial history and needs, income, bank details, payment details and information obtained as a result of our credit checks
- Financial information obtained if you request cancellation of your insurance policy and any information relating to the cancellation
- Information obtained when we carry out checks of sanction lists
- Information obtained through our use of cookies. Please see our cookies policy for more information
- Information captured during recordings of our telephone calls
- Your marketing preferences
- Any information we record about your preferences when doing business with us

3.2.2. What special categories of information might we collect?

- Details of your current or former physical or mental health – for example where we have placed workers compensation insurance for you, we may have details about your employees' accidents and injuries
- Information relating to criminal sanctions (including offences and alleged offences and any caution, court sentence or criminal conviction). We may receive this information as a result of carrying out checks of sanctions lists. Gallagher will only collect and process information relating to criminal sanctions to the extent permitted by applicable local law
- Information relating to any professional disciplinary action that you are or have been the subject of
- Any other special categories of information you offer up when communicating with us. We will only process such information to the extent necessary in connection with the insurance policy

or where in connection with legal proceedings. Any further processing will only be with your explicit consent.

3.2.3. How will we collect your personal information?

We may collect your information in a number of ways:

- Directly from you or from someone else on your behalf in a number of ways including where it is submitted through our website or in application forms, initial disclosure documents, proposal forms, renewal terms, requests for mid-term adjustments, when you require assistance in making a claim, through interactions with our website and more generally during any forms of communication such as face to face, written and telephone correspondence.
- From third parties and other insurance market participants who might introduce customers to us such as another broker and insurers
- From other brokers who act directly for you and who have approached us to facilitate the placement of an insurance policy for you
- From other third parties involved in the relevant insurance policy or claim such as claimants, witnesses to an incident, loss adjusters, claims handlers and medical experts
- Via publicly available sources such as internet search engines, open electoral registers and social media sites
- From other companies within the Arthur J. Gallagher group
- Through customer satisfaction surveys and market research
- From credit reference agencies
- Via insurance industry fraud prevention and detection databases and sanctions screening tools
- From government agencies such as Swedish Transport Agency (“Transportstyrelsen”) or Tax Authorities (“Skatteverket”)

3.2.4. What will we use your personal information for?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We need to use your personal information to enter into or perform our contract with you. For example, in order to fulfill our obligations under our contract and place appropriate insurance cover, we need to use your personal information to provide you with appropriate insurance cover according to your needs.
- We have a legitimate business interest to use your personal information such as maintaining our business records, keeping records of insurance policies we place and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm

- We have a legal or regulatory obligation to use your personal information. For example, our regulators impose certain record-keeping rules which we must adhere to

When the information that we process is classed as a special category of information, we must have one of the following additional legal grounds for such processing:

- It is necessary for compliance with a legal obligation or it is in the substantial public interest. This will apply where we are undertaking any activities to prevent and detect fraud.
- You have provided your consent. There may be some circumstances that without your consent to use your special categories of information we would be unable to arrange your insurance cover. We will notify you when this will be applicable and why your consent is necessary
- Where the use of your special categories of information is necessary to establish, exercise or defend legal claims, for example legal proceedings have been brought against us or we want to bring a legal claim ourselves.

Please see below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
To evaluate your insurance needs and risk appetite, match those to appropriate insurer, policy and premium and obtain quotes for you	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a legitimate business interest (to determine market placement and place insurance cover for you that is in line with your insurance needs) 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims
To arrange appropriate insurance cover and provide policy documentation	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a legitimate business interest (to ensure that you have the appropriate policy documentation) 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims
To arrange for the collection of, to collect or refund premiums or pay claims	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a legitimate business interest (to ensure that your insurance cover is placed, that you are able to meet your financial obligations, you receive refunds that are due and you are paid claims when due) 	Not applicable

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
To assist in any claims made under an insurance policy we have placed	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a legitimate business interest (to assist customers in any claims they have) 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims
To assist with any renewals, mid-term adjustments of your insurance policy or cancellations	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a legitimate business interest (to provide you with appropriate broking services where you request a renewal, mid-term adjustment or cancellation of the insurance policy we have placed) 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims
To set you up as a customer including carrying out fraud, sanctions, credit and anti-money laundering checks	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a legitimate business interest (to carry out appropriate credit checks and fraud checks) • We have a legal or regulatory obligation 	<ul style="list-style-type: none"> • The prevention and detection of fraud is in the substantial public interest. • It is necessary to establish, exercise or defend legal claims.
General client care, communicating with you, responding to any enquiries you have	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a legal or regulatory obligation • We have a legitimate business interest (to generally respond to our customers) 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims
Complying with our legal or regulatory obligations (such as our requirements to report to the FSA)	<ul style="list-style-type: none"> • We have a legal or regulatory obligation 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims
Prevention and detection of and investigating and prosecuting fraud. This might include sharing your personal information with third parties such as the police, and other insurance and financial services providers.	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a legitimate business interest (to ensure that we take all necessary precautions to prevent fraud) 	<ul style="list-style-type: none"> • The prevention and detection of fraud is in the substantial public interest. • It is necessary to establish, exercise or defend legal claims.
Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers)	<ul style="list-style-type: none"> • We have a legitimate business interest (to continually improve our services) 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
Managing our business operations such as maintaining accounting records, analysing financial results, complying with internal audit requirements and receiving professional advice (e.g. tax or legal advice)	<ul style="list-style-type: none"> We have a legitimate business interest (to carry out business operations and activities that are necessary for the everyday running of a business) 	Not applicable
Monitoring applications, reviewing, assessing, tailoring and improving our products and services and similar products and services offered by Gallagher	<ul style="list-style-type: none"> We have a legitimate business interest (to market out services) 	Not applicable
Tracing and recovering debt	<ul style="list-style-type: none"> We have a legitimate business interest (to trace and receive any debt which is owed to us) 	<ul style="list-style-type: none"> It is necessary to establish, exercise or defend legal claims
Monitoring usage of any of the various Gallagher websites	<ul style="list-style-type: none"> We have a legitimate business interest (to assess usage of our website) 	Not applicable
To apply for and claim on our own insurance	<ul style="list-style-type: none"> We have a legitimate business interest (to have our own insurance) 	<ul style="list-style-type: none"> We have your explicit consent It is necessary to establish, exercise or defend legal claims
Advertising, marketing, and promotional purposes, including to reach you by email, post and telephone with more relevant advertisements and to evaluate, measure and improve the effectiveness of our advertising campaigns; to send you newsletters, offers or other information we think may interest you; to contact you about our services or information we think may interest you; and to administer promotions.	<ul style="list-style-type: none"> With your consent, or based on a legitimate business interest or as otherwise permitted by law 	Not applicable
Advising, improving or developing products and services through risk modelling and data analysis, e.g. understanding risk exposures, crafting solutions with appropriate insurance coverage, limits, deductibles based on historical dataset	<ul style="list-style-type: none"> We have a legitimate business interest (to improve and develop products and services by drawing on our experience with ongoing and prior relationships) 	Not applicable

3.2.5. Who will we share your personal information with?

We may share your personal information with companies in the Arthur J. Gallagher group to serve you, including for the activities listed above.

We may share personal information with the following third parties for the purposes set out above:

- our insurance partners such as other insurance intermediaries, insurers, reinsurers or other companies who act as insurance distributors
- other brokers who act directly for you and who have approached us to facilitate the placement of an insurance policy for you
- other third parties who assist in the administration of insurance policies such as accountants, auditors, lawyers, loss adjusters, third parties involved in handling or otherwise addressing claims, such as healthcare professionals and other experts
- insurance broking platform providers
- fraud detection agencies and other third parties who operate and maintain fraud detection registers
- investigative firms we ask to look into claims on our behalf in relation to suspected fraud
- our regulators
- the police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime
- other insurers who provide our own insurance
- industry bodies
- premium finance providers
- debt collection agencies
- credit reference agencies
- our third party services providers such as IT suppliers, finance and payment providers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers and insurance software providers
- selected third parties in connection with the sale, transfer or disposal of our business

If you would like further information regarding the disclosures of your personal information, please see the "Contacting us" section below for our contact details.

3.3 Third party claimant

This section will detail what personal information we collect about you and use if you have made a claim against a customer for whom we have placed insurance cover.

3.3.1. What personal information might we collect?

3.3.2. What special categories of information might we collect?

3.3.3. How will we collect your personal information?

3.3.4. What will we use your personal information for?

3.3.5. Who will we share your personal information with?

3.3.1. What personal information might we collect?

- General information such as your name, date of birth, gender, relationship to the customer (where are you not the prospective policyholder), identification information such as national identification number, passport number or driving license number
- Contact details including address, telephone number and email address
- If relevant to your claim, we may collect the following information about you:
 - information about your job including job title, business description, education, employment history and professional certifications
 - your financial information such as your financial history and needs, income, bank details, payment details and information obtained as a result of our credit and anti-fraud checks
- Information obtained when we carry out checks of sanction lists
- Information obtained through our use of cookies. Please see our cookies policy for more information
- Information captured during recordings of our telephone calls

3.3.2. What special categories of information might we collect?

- Details of your current or former physical or mental health if it is relevant to your claim – for example where you have been injured in a motor accident and the driver is insured under a policy we placed
- Information relating to criminal sanctions (including offences and alleged offences and any caution, court sentence or criminal conviction). We may receive this information if it is relevant to your claim or as a result of carrying out sanctions lists. Gallagher will only collect and process information relating to criminal sanctions to the extent permitted by applicable local law
- We may also collect information because it is relevant to your claim, which reveals or is likely to reveal your race or ethnicity, religious or philosophical beliefs; political opinions; trade union membership; or data concerning your sex life or sexual orientation, for example where we seek to validate or investigate a claim we may receive files containing any of the above information. We may also need to collect this information to assess the value of your claim

- Any other special categories of information you offer up when communicating with us about your claim. We will only process such information to the extent necessary in connection with your claim or where in connection with legal proceedings. Any further processing will only be with your explicit consent.

3.3.3. How will we collect your personal information?

We may collect your information in a number of different ways:

- Directly from you
- From our customer who is the policyholder
- From third parties involved in the insurance process such as another broker and insurers
- From other third parties involved in the relevant insurance policy or claim such as other claimants, witnesses to an incident, loss adjusters, claims handlers and medical experts
- Via publically available sources such as internet search engines, open electoral registers and social media sites
- From other companies within the Arthur J. Gallagher group
- Via insurance industry fraud prevention and detection databases and sanctions screening tools
- From government agencies such as Swedish Transport Agency (“Transportstyrelsen”) or Tax Authorities (“Skatteverket”) and from professional regulators
-

3.3.4. What will we use your personal information for?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We have a legitimate business interest to use your personal information such as maintaining our business records, keeping records of insurance policies we place and claims made under such policies and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm.
- We have a legal or regulatory obligation to use your personal information. For example, our regulators impose certain record-keeping rules which we must adhere to.

When the information that we process is classed as a special category of information, we must have one of the following additional legal grounds for such processing:

- It is necessary for compliance with a legal obligation or it is in the substantial public interest. This will apply where we are assisting with any claims under a policy, and undertaking activities to prevent and detect fraud.

- Where the use of your special categories of information is necessary to establish, exercise or defend legal claims, for example legal proceedings are being brought against us or we want to bring a legal claim ourselves.

Please see below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
To assist in any claims made under an insurance policy we placed	<ul style="list-style-type: none"> • We have a legitimate business interest (to assist in any claims which have been made under an insurance policy we placed) 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims •
Complying with our legal or regulatory obligations (such as our requirements to report to the FSA)	<ul style="list-style-type: none"> • We have a legal or regulatory obligation. 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims •
Prevention and detection of and investigating and prosecuting fraud. This might include sharing your personal information with third parties such as the police, and other insurance and financial services providers.	<ul style="list-style-type: none"> • We have a legitimate business interest (to ensure that we take all necessary precautions to prevent fraud) 	<ul style="list-style-type: none"> • The prevention and detection of fraud is in the substantial public interest • It is necessary to establish, exercise or defend legal claims
Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers)	<ul style="list-style-type: none"> • We have a legitimate business interest (to continually improve our services) 	<ul style="list-style-type: none"> • It is necessary to establish or defend legal claims
Managing our business operations such as maintaining accounting records, analysing financial results, complying with internal audit requirements and receiving professional advice (e.g. tax or legal advice)	<ul style="list-style-type: none"> • We have a legitimate business interest (to carry out business operations and activities that are necessary for the everyday running of a business) 	Not applicable
Advising, improving or developing products and services through risk modelling and data analysis, e.g. understanding risk exposures, crafting solutions with appropriate insurance coverage, limits, deductibles based on historical datasets	<ul style="list-style-type: none"> • We have a legitimate business interest (to improve and develop products and services by drawing on our experience with ongoing and prior relationships) 	Not applicable

3.3.5. Who will we share your personal information with?

Final Version For Use From 1 September 2022

We may share your personal information with companies in the Arthur J. Gallagher group to serve you, including for the activities listed above.

We may share personal information with the following third parties for the purposes set out above:

- our insurance partners such as other insurance intermediaries, insurers, reinsurers or other companies who act as insurance distributors
- other brokers who act directly for you and who have approached us to facilitate the placement of an insurance policy for you
- other third parties who assist in the administration of insurance policies such as loss adjusters, claims handlers, accountants, auditors, lawyers and other experts
- insurance broking platform providers
- fraud detection agencies and other third parties who operate and maintain fraud detection registers
- investigative firms we ask to look into claims on our behalf in relation to suspected fraud
- our regulators
- the police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime
- other insurers who provide our own insurance
- industry bodies
- debt collection agencies
- credit reference agencies
- our third party services providers such as IT suppliers, finance and payment providers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers and insurance software providers
- selected third parties in connection with the sale, transfer or disposal of our business

If you would like further information regarding the disclosures of your personal information, please see the "Contacting us" section below for our contact details.

[Experts instructed in relation to claims](#)

This section will detail what personal information we collect about you and use if you are an expert instructed in relation to a claim which has been made under an insurance policy we placed.

3.4.1. What personal information might we collect?

3.4.2. How will we collect your personal information?

3.4.3. What will we use your personal information for?

3.4.4. Who will we share your personal information with?

3.4.1. What personal information might we collect?

- General information such as your name, identification information such as national identification number, passport number or driving license number
- Contact details including address, telephone number and email address
- Information about your job including job title, business description, education, employment history and professional certifications
- Information captured during recordings of our telephone calls

3.4.2. How will we collect your personal information?

We may collect your information in a number of different ways:

- Directly from you
- From other third parties involved in the insurance process and claims process such as another broker and insurers
- Via publically available sources such as internet search engines, open electoral registers and social media sites
- From other companies within the Arthur J. Gallagher group

3.4.3. What will we use your personal information for?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We have a legitimate business interest to use your personal information such as maintaining our business records, keeping records of insurance policies we place and business entities we interact with and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm.
- We have a legal or regulatory obligation to use your personal information.

Please click below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
To assist in any claims made under an insurance policy we have placed	<ul style="list-style-type: none">• It is necessary to enter into/perform our contract• We have a legitimate business interest (to assist customers in any claims they have)	Not applicable

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
Managing our business operations such as maintaining accounting records, analysing of financial results, complying with internal audit requirements and receiving professional advice (e.g. tax or legal advice)	<ul style="list-style-type: none"> We have a legitimate business interest (to carry out business operations and activities that are necessary for the everyday running of a business) 	Not applicable
Advising, improving or developing products and services through risk modelling and data analysis, e.g. understanding risk exposures, crafting solutions with appropriate insurance coverage, limits, deductibles based on historical dataset	<ul style="list-style-type: none"> We have a legitimate business interest (to improve and develop products and services by drawing on our experience with ongoing and prior relationships) 	Not applicable

3.4.4. Who will we share your personal information with?

We may share your personal information with companies in the Arthur J. Gallagher group to serve you, including for the activities listed above.

We may share personal information with the following third parties for the purposes set out above:

- our insurance partners such as other insurance intermediaries, insurers, reinsurers or other companies who act as insurance distributors
- other third parties who assist in the administration of claims such as loss adjusters, claims handlers, accountants, auditors, lawyers and other experts
- investigative firms we ask to look into claims on our behalf in relation to suspected fraud
- our regulators
- our third party services providers such as IT suppliers, finance and payment providers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers and insurance software providers
- selected third parties in connection with the sale, transfer or disposal of our business

If you would like further information regarding the disclosures of your personal information, please see the "Contacting us" section below for our contact details.

3.5 Witnesses to an incident

This section will detail what personal information we collect about you and use if you are a witness to an incident which is the subject of a claim made under an insurance policy we have placed.

3.5.1. What personal information might we collect?

3.5.2. What special categories of information might we collect?

3.5.3. How will we collect your personal information?

3.5.4. What will we use your personal information for?

3.5.5. Who will we share your personal information with?

3.5.1. What personal information might we collect?

- General information such as your name, date of birth, gender and occupation
- Contact details including address, telephone number and email address
- Information which is relevant to the incident you witnessed
- Information captured during recordings of our telephone calls

3.5.2. What special categories of information might we collect?

- Special categories of information will only be collected where it is relevant to an incident, for example a particular health condition that is of relevance to your statement

3.5.3. How will we collect your personal information?

We may collect your information in a number of different ways:

- Directly from you
- From our customer who is the policyholder
- From other third parties involved in the claims process such as another broker and insurers
- From other third parties involved in the relevant claim such as claimants, other witnesses, loss adjusters, claims handlers and medical experts
- Via publically available sources such as internet search engines, open electoral registers and social media sites

3.5.4. What will we use your personal information for?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We have a legitimate business interest to use your personal information such as maintaining our business records, keeping records claims made under insurance policies we have arranged and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm.

- We have a legal or regulatory obligation to use your personal information. For example, our regulators impose certain record-keeping rules which we must adhere to.

When the information that we process is classed as a special category of information, we must have one of the following additional legal grounds for such processing:

- It is necessary for compliance with a legal obligation or it is in the substantial public interest. This will apply where we are assisting with any claims under a policy, and undertaking any activities to prevent and detect fraud.
- You have provided your consent.
- Where the use of your special categories of information is necessary to establish, exercise or defend legal claims, for example legal proceedings have been brought against us or we want to bring a legal claim ourselves.

Please see below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
To assist in any claims made under an insurance policy we placed	<ul style="list-style-type: none"> • We have a legitimate business interest (to assist in any claims made under an insurance policy we have arranged) 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims • We have your explicit consent
Complying with our legal or regulatory obligations (such as our requirements to report to the FSA)	<ul style="list-style-type: none"> • We have a legal or regulatory obligation 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims •
Prevention and detection of and investigating and prosecuting fraud. This might include sharing your personal information with third parties such as the police, and other insurance and financial services providers.	<ul style="list-style-type: none"> • We have a legitimate business interest (to ensure that we take all necessary precautions to prevent fraud) 	<ul style="list-style-type: none"> • The prevention and detection of fraud is in the substantial public interest. • It is necessary to establish, exercise or defend legal claims
Managing our business operations such as maintaining accounting records, analysing of financial results, complying with internal audit requirements and receiving professional advice (e.g. tax or legal advice)	<ul style="list-style-type: none"> • We have a legitimate business interest (to carry out business operations and activities that are necessary for the everyday running of a business) 	Not applicable

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
Advising, improving or developing products and services through risk modelling and data analysis, e.g. understanding risk exposures, crafting solutions with appropriate insurance coverage, limits, deductibles based on historical dataset	<ul style="list-style-type: none"> We have a legitimate business interest (to improve and develop products and services by drawing on our experience with ongoing and prior relationships) 	Not applicable

3.5.5. Who will we share your personal information with?

We may share your personal information with companies in the Arthur J. Gallagher group to serve you, including for the activities listed above.

We may share personal information with the following third parties for the purposes set out above:

- our insurance partners such as other insurance intermediaries, insurers, reinsurers or other companies who act as insurance distributors
- other third parties who assist in the administration of insurance policies and claims such as loss adjusters, claims handlers, accountants, auditors, lawyers and other experts
- fraud detection agencies and other third parties who operate and maintain fraud detection registers
- investigative firms we ask to look into claims on our behalf in relation to suspected fraud
- our regulators
- the police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime
- other insurers who provide our own insurance
- industry bodies
- debt collection agencies
- our third party services providers such as IT suppliers, finance and payment providers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers and insurance software providers
- selected third parties in connection with the sale, transfer or disposal of our business

If you would like further information regarding the disclosures of your personal information, please see the "Contacting us" section below for our contact details.

Brokers, insurers and reinsurers

This section will detail what personal information we collect about you and use if you are a wholesale broker, third party producing broker, an appointed representative, an insurer or reinsurer.

3.6.1. What personal information might we collect?

3.6.2. What special categories of information might we collect?

3.6.3. How will we collect your personal information?

3.6.4. What will we use your personal information for?

3.6.5. Who will we share your personal information with?

3.6.1. What personal information might we collect?

- General information such as your name, identification information such as national identification number, passport number or driving licence number
- Contact details including address, telephone number and email address
- Information about your job including job title, business description, education, employment history and professional certifications
- Information obtained when we carry out checks of sanction lists
- Information obtained through our use of cookies. Please see our cookies policy for more information
- Information obtained as a result of carrying out due diligence
- Information captured during recordings of our telephone calls
- Your marketing preferences
- Any information we record about your preferences when doing business with us

3.6.2. What special categories of information might we collect?

- Information relating to criminal sanctions (including offences and alleged offences and any caution, court sentence or criminal conviction). We may receive this information as a result of carrying out checks of sanctions lists
- Any information we record that is relevant to you doing business with us

3.6.3. How will we collect your personal information?

We may collect your information in a number of different ways:

- Directly from you

- From other third parties involved in the insurance process such as another broker and insurers
- Via publically available sources such as internet search engines, open electoral role and social media sites
- From other companies within the Arthur J. Gallagher group
- Via insurance industry fraud prevention and detection databases and sanctions screening tools

3.6.4. What will we use your personal information for?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We need to use your personal information to enter into or perform our contract with you.
- We have a legitimate business interest to use your personal information such as maintaining our business records, keeping records of insurance policies we place and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm
- We have a legal or regulatory obligation to use your personal information.

When the information that we process is classed as a special category of information, we must have one of the following additional legal grounds for such processing:

- It is necessary for compliance with a legal obligation or it is in the substantial public interest. This will apply where we undertake activities to prevent and detect fraud.
- You have provided your consent.
- Where the use of your special categories of information is necessary to establish, exercise or defend legal claims, for example legal proceedings are being brought against us or we want to bring a legal claim ourselves.

Please see below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
To enter into business relationships which facilitate and enable us to place insurance policies for our customers	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a legitimate business interest (to enter into arrangements with other insurance partners so that we can provide services to our customers) 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
To carrying out fraud, sanctions and anti-money laundering checks	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a legitimate business interest (to ensure that we take all necessary precautions to prevent fraud) • We have a legal or regulatory obligation 	<ul style="list-style-type: none"> • The prevention and detection of fraud is in the substantial public interest. • It is necessary to establish, exercise or defend legal claims. •
Complying with our legal or regulatory obligations (such as our requirements to report to the FSA)	<ul style="list-style-type: none"> • We have a legal or regulatory obligation 	<ul style="list-style-type: none"> • It is necessary to establish, exercise or defend legal claims •
Providing improved quality, training and security (for example, with respect to recorded calls)	<ul style="list-style-type: none"> • We have a legitimate business interest (to carry out business operations and activities that are necessary for the everyday running of a business) 	Not applicable
Managing our business operations such as maintaining accounting records, analysing of financial results, complying with internal audit requirements and receiving professional advice (e.g. tax or legal advice)	<ul style="list-style-type: none"> • We have a legitimate business interest (to carry out business operations and activities that are necessary for the everyday running of a business) 	Not applicable
Monitoring applications, reviewing, assessing, tailoring and improving our products and services and similar products and services offered by Gallagher	<ul style="list-style-type: none"> • We have a legitimate business interest (to market our services) 	Not applicable
To apply for and claim on our own insurance.	<ul style="list-style-type: none"> • We have a legitimate business interest (to have our own insurance) 	<ul style="list-style-type: none"> • We have your explicit consent • It is necessary to establish, exercise or defend legal claims

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
Advertising, marketing, and promotional purposes, including to reach you by email, post or telephone with more relevant advertisements and to evaluate, measure and improve the effectiveness of our advertising campaigns; to send you newsletters, offers or other information we think may interest you; to contact you about our services or information we think may interest you; and to administer promotions.	<ul style="list-style-type: none"> • With your consent, or based on a legitimate business interest or as otherwise permitted by law 	Not applicable
Advising, improving or developing products and services through risk modelling and data analysis, e.g. understanding risk exposures, crafting solutions with appropriate insurance coverage, limits, deductibles based on historical dataset	<ul style="list-style-type: none"> • We have a legitimate business interest (to improve and develop products and services by drawing on our experience with ongoing and prior relationships) 	Not applicable

3.6.5. Who will we share your personal information with?

We may share your personal information with companies in the Arthur J. Gallagher group to serve you, including for the activities listed above.

We may share personal information with the following third parties for the purposes set out above:

- our insurance partners such as other insurance intermediaries, insurers, reinsurers or other companies who act as insurance distributors
- other third parties who assist in the administration of insurance policies and claims such as loss adjusters, claims handlers, accountants, auditors, lawyers and other experts
- insurance broking platform providers
- fraud detection agencies and other third parties who operate and maintain fraud detection registers
- investigative firms we ask to look into claims on our behalf in relation to suspected fraud
- our regulators
- the police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime

- other insurers who provide our own insurance
- industry bodies
- credit reference agencies
- our third party services providers such as IT suppliers, finance and payment providers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers and insurance software providers
- selected third parties in connection with the sale, transfer or disposal of our business

If you would like further information regarding the disclosures of your personal information, please see the "Contacting us" section below for our contact details.

3.7 Users of our various Gallagher websites

This section will detail what personal information we collect about you and use if you access and use any of the Gallagher websites.

3.7.1. What personal information might we collect?

3.7.2. How will we collect your personal information?

3.7.3. What will we use your personal information for?

3.7.4. Who will we share your personal information with?

3.7.1. What personal information might we collect?

- General information collected via the website such as your name, job title and company you work for
- Contact details including telephone number and email address
- Any information that you choose to provide to us in relation to the nature of your query
- Your IP address
- Your marketing preferences
- Information obtained through our use of cookies. Please see our cookies policy for more information

3.7.2. How will we collect your personal information?

- Directly from any of the Gallagher websites you use

3.7.3. What will we use your personal information for?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We have a legitimate business interest to use your personal information such as maintaining our business records, monitoring usage of our website and marketing our services and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm.
- We have a legal or regulatory obligation to use your personal information. For example, our regulators impose certain record-keeping rules which we must adhere to.

Please see below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
Communicating with you and responding to any enquiries you have	<ul style="list-style-type: none"> • We have a legitimate business interest (to respond to any enquiries) 	Not applicable
Monitoring and analysing usage of any of the various Gallagher websites and presenting relevant information to you based upon your browsing habits	<ul style="list-style-type: none"> • We have a legitimate business interest (to assess usage of our website and to point you to relevant materials based upon your browsing habits) 	Not applicable
Advertising, marketing, and promotional purposes, including to reach you by email, post or telephone with more relevant advertisements and to evaluate, measure and improve the effectiveness of our advertising campaigns; to send you newsletters, offers or other information we think may interest you; to contact you about our services or information we think may interest you; and to administer promotions.	<ul style="list-style-type: none"> • With your consent, or based on a legitimate business interest or as otherwise permitted by law 	Not applicable

3.7.4. Who will we share your personal information with?

We may share your personal information with companies in the Arthur J. Gallagher group for the purposes set out above.

Members of a Scheme that we administer

This section will detail what personal information we collect about you and use if you are a member of a Scheme that we administer.

3.8. Members of a Scheme we administer

3.8.1. What personal information might we collect?

3.8.2. How will we collect your personal information?

3.8.3. What will we use your personal information for?

3.8.4. Who will we share your personal information with?

3.8.1. What personal information might we collect?

- General information such as your name, your membership start and end date
- Contact details including address, telephone number and email address
- Information about your job including the company that you work for, job title, business description
- Information captured during recordings of our telephone calls
- Information obtained through our use of cookies. Please see our cookies policy for more information
- Your marketing preferences
- Any information we record about your preferences when doing business with us

3.8.2. How will we collect your personal information?

We may collect your information in a number of different ways:

- We will obtain your personal information directly from you or from someone else on your behalf in a number of ways including where it is submitted through our website or in application forms, through interactions with our website and more generally during any forms of communication such as face to face, written and telephone correspondence.
- From third parties who might introduce potential Scheme members to us.
- Via publicly available sources such as internet search engines, open electoral registers and social media sites.

3.8.3. What will we use your personal information for?

We may process your information for a number of different purposes. For each purpose we must have a legal ground for such processing and we will rely on the following legal grounds:

- We need to use your personal information to enter into or perform our contract with you. For example, in order to fulfill our obligations under our contract to provide Scheme Administration services to you.
- We have a legitimate business interest to use your personal information such as maintaining our business records, keeping records of insurance policies we place and analysing and improving our business model and services. When using your personal information for these purposes, we have considered your rights and ensured that our business need does not cause you harm.

- We have a legal or regulatory obligation to use your personal information. For example, our regulators impose certain record-keeping rules which we must adhere to.

Please see below for further details of the different ways we use your personal information and the legal grounds we rely on when doing so.

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
To set you up as a member of a Scheme we administer and to manage your Scheme membership including operations such as processing payments, managing membership databases, maintaining accounting records, analysis of financial results, complying with internal audit requirements	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a legitimate business interest (to ensure that you can reap the benefits of being a member of the Scheme and to carry out business operations and activities that are necessary for the everyday running of a business) 	Not applicable
General client care, communicating with you, responding to any enquiries you have	<ul style="list-style-type: none"> • It is necessary to enter into/perform our contract • We have a legitimate business interest (to generally respond to our customers) 	Not applicable
Providing improved quality, training and security (for example, with respect to recorded or monitored phone calls to our contact numbers)	<ul style="list-style-type: none"> • We have a legitimate business interest (to continually improve our services) 	Not applicable
Monitoring applications, reviewing, assessing, tailoring and improving our products and services and similar products and services offered by Gallagher	<ul style="list-style-type: none"> • We have a legitimate business interest (to market our services) 	Not applicable
Tracing and recovering debt	<ul style="list-style-type: none"> • We have a legitimate business interest (to trace and receive any debt which is owed to us) 	Not applicable

Purpose for processing	Legal grounds for using your personal information	Legal grounds for using your special categories of information
Advertising, marketing, and promotional purposes, including to reach you by email, post or telephone with more relevant advertisements and to evaluate, measure and improve the effectiveness of our advertising campaigns; to send you newsletters, offers or other information we think may interest you; to contact you about our services or information we think may interest you; and to administer promotions	<ul style="list-style-type: none"> With your consent, or based on a legitimate business interest or as otherwise permitted by law 	Not applicable
Advising, improving or developing products and services through risk modelling and data analysis, e.g. understanding risk exposures, crafting solutions with appropriate insurance coverage, limits, deductibles based on historical dataset	<ul style="list-style-type: none"> We have a legitimate business interest (to improve and develop products and services by drawing on our experience with ongoing and prior relationships) 	Not applicable

3.8.5. Who will we share your personal information with?

We may share your personal information with companies in the Arthur J. Gallagher group to serve you, including for the activities listed above.

We may share personal information with the following third parties for the purposes set out above:

- Scheme administrators
- Other third parties who assist in the administration of Scheme Membership
- The police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime
- Credit reference agencies
- Debt collection agencies
- Industry bodies
- Our third party services providers such as IT suppliers, finance and payment providers, actuaries, auditors, lawyers, marketing agencies, document management providers, tax advisers and insurance software providers
- Selected third parties in connection with the sale, transfer or disposal of our business.

If you would like further information regarding the disclosures of your personal information, please see the “Contacting Us” section below for our contact details.

How do we protect your personal information when sending it abroad?

Sometimes we (or third parties acting on our behalf) will transfer personal information that we collect about you to countries outside of the European Economic Area ("EEA"). Our regular transfers include:

Country of transfer	Reason for the transfer	Method we use to protect your information
United Kingdom	<ul style="list-style-type: none"> To provide services to EEA-based clients on a day-to-day basis 	<ul style="list-style-type: none"> Intragroup data transfer agreement (utilising Standard Contractual Clauses (Controller to Controller))
United States	<ul style="list-style-type: none"> Central IT systems (including corporate emails) are routed through our US parent company AJG & Co who also provide certain email, file share and application support services. Data analysis for the purposes of risk modelling, advising, improving or developing products and services through data analysis, e.g. understanding risk exposures, crafting solutions with appropriate insurance coverage, limits, deductibles based on historical dataset 	<ul style="list-style-type: none"> Intragroup data transfer agreements (utilising Standard Contractual Clauses (Controller to Controller))
India	<ul style="list-style-type: none"> To assist with our back office functions 	<ul style="list-style-type: none"> Intragroup data transfer agreements (utilising Standard Contractual Clauses (Controller to Processor))

Where other transfers to countries outside of the EEA take place this will be subject to appropriate mechanisms to ensure they have an adequate level of protection.

If you would like further information regarding our data transfers and the steps we take to safeguard your personal information, please see the "Contacting us" section below for our contact details.

What marketing activities do we carry out?

We may from time to time provide you with information about our products or services or those of our partners which we think will be of interest to you. These may be sent by email or post or we may contact you by telephone.

We ensure that our marketing activities comply with all applicable legal requirements. In some cases, this may mean that we ask for your consent in advance of sending you marketing materials.

You can opt out of receiving marketing communications at any time. An "unsubscribe" link appears in all our marketing emails. To unsubscribe from emails sent by us, simply click on the link at any time. Alternatively, you can contact us to update your preferences at <https://cloud.info.ajg.com/communications-international>. In such circumstances, we will continue where necessary to send you service related communications including information related to the renewal of your policy.

How long do we keep personal information for?

We will only store your personal information for as long as reasonably necessary to fulfil the purposes set out in this Privacy Notice and to comply with our regulatory and/ or legal obligations.

When personal information is no longer needed, we de-identify or aggregate the data (in which case we may retain this de-identified or aggregated data for analytics purposes) or securely destroy it.

We have a detailed retention policy in place which governs how long we will hold different types of information for. The exact time period will depend on the purpose for which we collected that information.

For further information regarding how long your personal information will be kept, please see the "Contacting us" section below for our contact details.

Automated processing and profiling

In order to determine insurance limits and insurance premiums, insurance market participants benchmark client and beneficiary attributes and likelihood for insured events to occur and to understand fraud patterns. This requires that Gallagher and other insurance market participants may compile and analyse information in respect of all insureds, beneficiaries and claimants to model such likelihoods. We may use personal and commercial information in order to create the models and also to match against the models (profiling) to determine both the risk and the premium price for you and other insureds based on similar exposures and risks. We also use this information to help advise you about the typical levels of insurance coverage that your peers may have in place. This may necessitate the use of special categories of data and criminal records data (such as prior motoring convictions for motor insurance).

Where a decision is necessary in relation to your insurance policy sometimes we may make decisions using automated means. The automated process will consider the information that you provide us (for example, details of the property that you wish to insure), as well as other information such as postcode, information resulting from analytics, and local crime rate, to determine whether your application for insurance can be accepted and the associated premium. Where we make automated decisions about you using your personal information, you may request that the decision is verified to confirm that the automated decision has been made correctly as well as to ask that it be reviewed by an individual decision-maker.

Your rights

Under data protection law you have the right to make certain requests in relation to the personal information that we hold about you. We will not usually make a charge for dealing with these

requests. If you wish to exercise these rights at any time please contact us using the details set out in the "Contacting us" section.

There may be cases where we may not be able to comply with your request (such as where this would conflict with our obligation to comply with other regulatory and/ or legal requirements). However, if we can't comply with your request, we will tell you the reason, and we will always respond to any request you make.

There may also be circumstances where exercising some of these rights (such as the right to erasure, the right to restriction of processing and the right to withdraw consent) will mean your insurance can no longer be provided and it may therefore result in cancellation of your policy. You will therefore lose the right to bring any claim or receive any benefit, including in relation to any event that occurred before you exercised your right of erasure, if our ability to handle the claim has been prejudiced. Your policy terms and conditions set out what will happen in the event your policy is cancelled.

Your rights include:

The right to access your personal information

You are entitled to a copy of the personal information we hold about you and certain details of how we use it.

We will usually provide you with your information in writing, unless you request otherwise, or where you have made the request using electronic means, in which case the information will, where possible, be provided to you by electronic means.

The right to rectification

We take reasonable steps to ensure that information we hold about you is accurate and complete. However, you can ask us to amend or update it if you do not believe this is the case.

The right to erasure

You have the right to ask us to erase your personal information in certain circumstances, for example where you withdraw your consent or where the personal information we collected is no longer necessary for the original purpose. This will need to be balanced against other factors however. For example, we may have regulatory and/ or legal obligations which mean we cannot comply with your request.

The right to restriction of processing

In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that we no longer need to use your personal information or where you think that the personal information we hold about you may be inaccurate.

The right to data portability

You have the right, under certain circumstances, to ask that we transfer personal information that you have provided to us to another third party of your choice.

The right to object to marketing

You can ask us to stop sending you marketing messages at any time. You can do this either by clicking on the "unsubscribe" link which is contained in any email that we send to you, or you can use the details set out in the "Contacting us" section to contact us. If you opt out of receiving marketing messages, we may still send you service-related communications where necessary including information related to the renewal of your policy.

Rights relating to automated decision-making

You can contact us using the details set out in the "Contacting us" section and ask us to review the decision if you have been subject to an automated decision using your personal information.

The right to withdraw consent

We will ask for your consent for certain uses of your personal information. Where we do this, you have the right to withdraw your consent to further use of your personal information.

The right to lodge a complaint with the Authority for privacy protection ("IMY/Datainspektionen")

We would always encourage you to contact us if you have any concerns with how we use your personal information and we will do our best to resolve your concerns. Where you feel that we have not addressed your concerns appropriately, please contact our Data Protection Office using the details in the Contacting Us section. However, you have a right to complain to IMY if you believe that any use of your personal information by us is in breach of applicable data protection laws and/ or regulations. More information can be found on IMY's website: <https://www.imy.se/>. This will not affect any other legal rights or remedies that you have.

How we protect your information

To protect your information we use a range of organizational and technical security measures.

Where we have given you (or you have chosen) a password, you are responsible for keeping this password confidential. Please do not share your password with anyone.

Within Gallagher we restrict access to your information as appropriate to those who need to know that information for the purposes set out above.

We use firewalls to block unauthorised traffic to the servers and the actual servers are located in a secure location which can only be accessed by authorised personnel. Our internal procedures cover the storage, access and disclosure of your information.

Contacting us

You may contact our Data Protection Office if you have any questions about how we collect, store or use your personal information:

Data Protection Office
The Walbrook Building
25 Walbrook
London EC4N 8AW
England

Email: DPO@AJG.com

Final Version For Use From 1 September 2022

[Updates to this Privacy Notice](#)

We may update this Privacy Notice periodically. When we do, we will post the current version on this site, and we will revise the version date located at the bottom of this page. We encourage you to periodically review this Privacy Notice so that you will be aware of our privacy practices.

This Privacy Notice was last updated on: 1 September 2022