Gallagher Global Privacy Notice

Updated: 27 October 2026

This Privacy Notice applies to Arthur J. Gallagher & Co. and its affiliates and subsidiaries (collectively, "Gallagher," "we," "our" or "us"). A full list of Gallagher group companies is available here.

This Notice explains what personal data we collect about you and how we use it. Unless a more specific privacy notice is provided at collection, it covers personal data you provide to us and personal data we collect from other sources. It does not apply to websites, applications or portals ("Sites") belonging to third-parties that are linked from Gallagher Sites, or to Gallagher Sites with their own privacy notices. If you provide us with personal data about others, you must give them a copy of this Notice and obtain any required consent for processing.

If you have questions, please contact us using the details in the Contact Us section. When using our Sites, read this Notice (or the applicable Site notice) alongside the Site's Terms of Use.

The sections below describe our practices for collecting, using, disclosing, and retaining your personal data:

1. Who we are
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1. Who we are

We are a global company providing a range of professional services including insurance and reinsurance brokerage, risk and claims management, employee benefits, human resources and communications consulting and administration, financial, pension administration and actuarial services through our various affiliates and subsidiaries. We also act as insurance distributors, including operating as managing general agents or under delegated authority from insurers, designing, placing, administering or managing insurance products and related services.

2. How we process your personal data

2.1 Individuals in scope of this Privacy Notice

This Privacy Notice provides information for those individuals whose personal data we process, including:

- **Business and professional contacts**, such as brokers, (re)insurers, managing general agents (MGAs), loss adjusters, claims experts and advisors, introducers, appointed representatives, service providers, suppliers, professional advisors, event or training attendees, visitors to our offices, and representatives of public bodies, regulators or government authorities.
- **Prospective, current or former customers and individuals connected with our clients,** including customers (and their employees), claimants, insured, beneficiaries and other individuals covered under, or in connection with, insurance policies, reinsurance arrangements, securities or other financial transactions, consulting or advisory arrangements, pension schemes, benefit plans and similar programs. This includes, for example, premium finance customers, current or former employees covered under employer-sponsored benefit or pension arrangements, pension scheme members, retired members, dependents, spouses and other beneficiaries for whom we provide services or administration, as well as individuals whose personal data we receive or access in connection with proposed or completed mergers, acquisitions, divestments or other corporate transactions involving our business or a third-party entity.
- **Users of our Sites**.
- **Other individuals who interact with us**, such as those who request or receive marketing or communications from us, make inquiries, participate in competitions, promotions, surveys or events, or whose images or likenesses are used in marketing materials or are captured on CCTV or other security systems.

2.2 How we collect your personal data

We collect personal data from a variety of sources, depending on how you interact with us, the services we provide, and as permitted or required by applicable law. These sources may include the following:

- **Directly from you or someone authorized to act on your behalf,** such as when you provide information to us in applications, during meetings, events, emails or calls, through our Sites, surveys or market research, or via other direct communications or interactions with us.
- **From our clients, business partners and professional counterparties**, such as commercial clients, (re)insurers, network partners, brokers, appointed representatives, introducers, employers, benefit plan sponsors or administrators, premium finance companies, health or benefit service providers, pension trustees or beneficiaries, data or marketing list providers and other third-party service providers involved in the provision or administration of our services.
- **From public records or other publicly available sources**, such as public registers, official records, social media platforms and other publicly accessible information sources.
- **From Gallagher affiliate companies,** where necessary for or otherwise consistent with the purposes described in this Privacy Notice.
- **From merger and acquisition partners,** where we acquire, merge with or otherwise combine with other organizations or businesses, or in connection with proposed or completed corporate transactions (including due diligence and integration activities).
- **From government bodies, regulators and public authorities**, such as law enforcement agencies, supervisory authorities or courts.
- **From background checks, screening and monitoring tools**, such as fraud prevention and detection databases, sanctions and watch-list screening tools, credit reference agencies and compliance service providers, where permitted or required by applicable law.
- **From other third parties,** including advisors or service providers acting on your behalf or in connection with the services we provide.

2.3 Personal data we collect

We collect the following categories of personal data, depending on the nature of your interaction with us (for example, as a current, former or prospective business contact, customer, claimant, insured, beneficiary, pension scheme member or participant, etc.), the services we provide, and as permitted or required by applicable law:

- **Basic personal and demographic information**, such as your name, date of birth, age, gender and marital or civil status.
- **Contact information**, such as your postal address, telephone number, email address and other contact details.
- **Identification and unique identifiers**, such as identifiers issued by government bodies or agencies (for example national identification numbers or social security numbers, passport numbers, tax identification numbers, driver's license or other identification numbers), and copies of official documents (such as birth, death or marriage certificates, military or service records, licenses, visas or passports).
- **Beneficiary and relationship information**, such as details of your relationships, family members and dependents (including children).
- **Employment and professional information**, such as your employer, job title, employment status, salary or remuneration information, employment benefits, pensionable service periods, employment history, professional memberships, certifications, licenses, training and disciplinary history.
- **Financial and economic information**, such as bank account details, payment and transaction information, credit card numbers, credit history, creditworthiness, tax information, income details, property, assets, liabilities, investments and investment preferences, pension and benefits, debts, brokerage account numbers, transaction information, and related financial records.
- **Insurance policy and risk information**, such as policy numbers, coverage details, premiums, terms and conditions, underwriting and risk assessment information, enrollment and eligibility details, benefit amounts, mid-term adjustments, renewals, cancellations and reasons for cancellation.
- **Claims and incident information**, such as information relating to claims or potential claims, a claimant's relationship to a policyholder or insured, claims history, claims numbers, dates and circumstances of claims, and information relating to loss, damage, injury, disability or death.
- **Plan and scheme information,** such as contributions levels, plan options, benefit selections and related administration.
- **Commercial and transactional information**, such as records of products or services purchased, obtained, considered or administered, and related consumption or usage history.
- **Communications and interaction information,** such as correspondence with us (including emails, telephone calls, messages or other communications), call recordings, meeting notice, voice recordings, photographs or video recordings, and records of interactions with our teams, events or services.
- **Events, meetings and premises information**, such as details of visits to our offices or sites (including CCTV), attendance at meetings, training sessions events or webinars, photographs or videos captured during meetings, events or calls with you.
- **Lifestyle and personal circumstances information**, such as travel history, interests and general wellbeing or health-related information.
- **Special category data and sensitive personal data**, where required for our services and permitted by applicable law, such as information relating to health (including protected

health information), genetic or biometric data, sex life, sexual orientation, gender identity, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union memberships.

- **Criminal records and regulatory information**, such as criminal charges or convictions (including driving offenses), fines or penalties, regulatory findings or confirmation of clean criminal records, where permitted or required by applicable law.
- **Professional conduct and disciplinary information**
- **Background, screening and compliance information,** such as information obtained through due diligence, background checks, fraud prevention checks, sanctions screening or politically exposed person (PEP) checks.
- **Marketing and communication preferences**, such as your marketing consents or opt-outs, preferences, interactions with marketing communications, campaigns or surveys, including whether you open emails, click links or respond to surveys.
- **Digital, technical and usage information**, such as usernames, authentication or access credentials, log data, device identifiers, domain name, browser type and version, operating system, traffic and usage data, browsing time, approximate location data, and information collected through cookies, pixels and similar tracking technologies, including interactions with our Sites and social media presence.

2.4 How we use your personal data

Depending on the nature of your interaction with us (for example, as a business contact, prospect, customer, claimant, insured, pension or employee benefit plan member, office or Site visitor, etc.), and as permitted or required by applicable law, we use your personal data to:

- **Perform services for you or our clients**
  - Provide services and fulfill our contractual and professional obligations, including providing services that you may not have personally requested but which were requested by our clients (who may be your employer), or business partners, and which require us to interact with you, directly or indirectly in connection with those services.
  - Recommend, quote, facilitate, arrange and enable placement, renewal and servicing of (re)insurance, benefits and related arrangements, and assist in their ongoing administration and management, including premium management, renewals, endorsements or adjustments, cancellations, claims handling, claims and benefits administration and settlement.
  - Make underwriting, pricing and claims-related determinations, assessments or recommendations, including where we act under delegated authority or perform functions on behalf of (re)insurers, benefit providers or other risk carriers.
  - Provide consulting, advisory, administration, financial, pension, actuarial, risk management, managerial and claims administration services, including operational, regulatory, governance and compliance-related support.
  - Advise clients, prospects and their organisations on the identification, management and mitigation of business risks and opportunities, including (re)insurance, benefits and pension arrangements, and on the management and administration of claims, programs and policies.
  - Conduct data analytics, research, surveys, benchmarking, and risk or predictive modelling to generate insights, trends, and analyses that support our clients' insurance, risk management, and organizational wellbeing needs.
  - Create and use de-identified, pseudonymized, and/or aggregated data sets and outputs (for example, industry, sector or portfolio-level insights, benchmarks, and reports) for sharing within Gallagher's group of companies and with the client and its authorized business partners.

- **Manage our business operations**
  - Enter into, manage and support business relationships, including conducting due diligence, compliance and background checks and monitoring activities (such as fraud prevention, identity verification, trade and economic sanctions screening, credit checks and anti-money laundering controls), and assessing risk, integrity and suitability of counterparties.
  - Create, maintain, administer, customize and secure accounts, profiles and access you or your organization may have with us, including managing authentication, preferences, communications and access to systems, platforms, Sites, and services.
  - Manage our financial, corporate and governance activities, including maintaining accounting and financial records, analyzing financial and operational performance, meeting internal audit, risk management and compliance requirements, obtaining professional advice, administering and making claims on our own insurance programs, managing or disputing claims and recovering debts.
  - Conduct data analytics, research, surveys, benchmarking, and risk or predictive modelling to generate insights, trends, and analyses for business, operational, research, and industry purposes, including the development, improvement and validation of products, services, models and tools. Where appropriate, this includes the creation and use of de-identified, pseudonymized and/or aggregated data sets and outputs (such as industry, sector or portfolio level insights, benchmarks and reports), which may be shared with business partners, industry participants and other third parties.
- **Communicate and market to you**
  - Communicate with you about your relationship with us, including administering and servicing your account, notifying you of changes to our policies, terms or notices, responding to your inquiries or requests, and sending administrative or service-related communications, as well as invitations to events, meetings or webinars.
  - Market, advertise, and promote our services (and, where relevant, the services of others) through a range of channels including email, telephone, post, LinkedIn and other social media platforms, SMS/text messages, online and personalized advertising, in accordance with applicable marketing and communications laws.
  - Send newsletters, updates, offers or other communications that may be of interest to you, and offer, administer and manage promotions, events and campaigns, subject to your preferences and applicable opt-in or opt-out requirements.
  - Carry out market research, surveys and feedback activities to understand client, prospect and market needs to inform our communications, services and offerings.
  - Monitor and analyze engagement with our Sites, communications and content and personalize your experience and the communications or marketing messages we send you to deliver content, product and service offerings that may be relevant to your interests, including targeted communications or advertisements delivered through our Sites, third-party Sites or platforms, and via email or SMS/text messages (with your consent, where required by applicable law).
  - Monitor, measure and improve the effectiveness of our marketing and communication activities, including through the use of cookies, pixels and other tracking technologies.
- **Comply with legal obligations**
  - Comply with applicable laws, regulations and legal processes, including responding to lawful requests from courts, regulators, supervisory authorities, law enforcement bodies or government agencies, and meeting obligations related to national security, public safety, discovery, investigations, audits or regulatory reporting.

- Establish, exercise, protect, enforce or defend legal rights and claims, including Gallagher's rights, your rights, and the rights of our clients or other third parties, such as in connection with litigation, disputes, claims, regulatory matters, investigations or insurance-related claims.

- **Monitor and prevent fraud or wrongdoing**
  - Protect the safety, security, integrity and availability of our products, services, systems, Sites, premises and data, including by monitoring, detecting and responding to security incidents, safeguarding against inadvertent loss, unauthorized access or disclosure, and malicious, deceptive, fraudulent, or illegal activity, and by diagnosing, debugging and resolving errors that impair the intended functionality of our systems, Sites, or services.
  - Monitor and help ensure the safety and security of our premises, property, employees, contractors and visitors, including through physical security measures, access controls, surveillance and related monitoring activities.
  - Prevent, detect, investigate and respond to fraud, misconduct or other wrongdoing, including facilitating the prevention, investigation and detection of crime, cooperating with (re)insurers, regulators and law enforcement authorities, supporting the apprehension or prosecution of offenders and complying with applicable legal and regulatory requirements.
- **Improve our services**
  - Develop, enhance, expand and modify our services, Sites, solutions and offerings through research, innovation, testing and development, leveraging data analytics, insights and feedback. For example, we use analytics-driven modelling and profiling to support (re)insurance and risk-related services for prospects, clients and business partners, analyzing information on (re)insureds, beneficiaries and claimants to understand risk characteristics, potential (re)insured events, claims patterns and broader market trends. These insights inform underwriting, pricing, coverage design, fraud prevention and our advice to (re)insurers and clients on appropriate levels and types of (re)insurance or benefits coverage and claims handling.
  - Monitor, review, assess and improve the performance, functionality and resilience of our systems, platforms and technologies, including Sites, applications, digital tools, content and social media channels to ensure they operate effectively, securely and in line with business and user expectations.
  - Develop, train, test, validate, deploy, monitor and improve models, systems and tools, including those involving analytics, artificial intelligence, machine learning, profiling and automated decision-making, to support service delivery, decision-making, risk assessment, innovation and operational efficiency.
  - Improve service quality, accuracy, training and security, including quality assurance, auditing, compliance monitoring, staff training, fraud prevention and security measures (for example, reviewing recorded communications for training, quality and security purposes).
- **Mergers and acquisitions**
  - Facilitate and evaluate corporate and commercial transactions, including restructurings, reorganizations, mergers, acquisitions, divestitures, joint ventures, assignments, transfers or other dispositions of all or a part of our business, assets or shares (including in connection with insolvency, bankruptcy or similar proceedings). As part of such transactions, personal data may be disclosed to, or transferred between, relevant parties (for example, counterparties, advisors, and successor entities) where

necessary to carry out due diligence, complete the transaction, or operate the business following completion. We will take reasonable steps to ensure that any recipient of your personal data is subject to appropriate confidentiality, security and data protection obligations and uses the data in a manner consistent with this Privacy Notice.

If we intend to use your personal data for a purpose that is not described in this Privacy Notice, or that is not compatible with the purpose for which it was collected, we will inform you of that new purpose and any relevant additional information, which may include our legal or regulatory obligations. Where required by applicable law, we will obtain your consent before processing your personal data for the new purpose.

2.5 Legal basis for processing personal data

Applicable data protection laws in some jurisdictions require us to identify the legal basis on which we process personal data. Depending on the circumstances and the purpose of the processing, we rely on one or more of the following legal bases, as permitted by applicable law:

- **Legitimate interests**, such as establishing and managing our business relationships and operations, marketing and promoting our services, managing mergers and acquisitions, performing and managing our contractual arrangements, maintaining business and insurance records, administering policies and claims, preventing fraud, ensuring information and system security, and developing, analyzing and improving our products and services, systems, models (including automated decision-making, profiling, and artificial intelligence technologies) and operations. When we rely on legitimate interests, we consider and balance our interests against the legal rights and expectations of the individuals concerned.
- **Performance of a contract,** where processing is necessary to enter into, perform, or administer a contract with you, or to take pre-contractual steps at your request.
- **Compliance with legal and regulatory obligations**, including responding to requests from regulators or authorities, meeting legal and regulatory reporting requirements, handling data protection rights requests, and establishing, exercising or defending legal claims.
- **Fraud or unlawful activity prevention and detection**, to protect individuals, our clients, our business or others from fraudulent, deceptive, or unlawful activity, in accordance with applicable law.
- **Consent,** where required by law, such as for certain marketing activities or where we otherwise seek your agreement to process personal data for specific purposes.

Where we process sensitive personal data (also referred to as special category data), we rely on one or more of the following legal bases, as permitted by applicable law:

- **Where necessary to establish, exercise or defend legal claims.**
- **Where necessary for (re)insurance, benefits or risk-related purposes** in the substantial public interest, where such processing is permitted under applicable laws.
- **Where necessary for the prevention or detection of an unlawful act and/or fraud,** in the substantial public interest, and in accordance with applicable law.
- **Explicit consent,** where required by law.

Where we receive personal data, including sensitive personal data or special category data from a third party, that third party is responsible for ensuring that any required consent has been obtained to enable us to process the data for the purposes described in this Privacy Notice.

Where we rely on your consent, you may withdraw it at any time in accordance with applicable law.

2.6 Who we share your personal data with

We may share your personal data within Gallagher's group of companies consistent with the purposes described in this Privacy Notice, including to provide and administer our services, support our business operations and controls, conduct analytics and reporting, develop, analyze and improve our products and services, systems, Sites, models (including automated decision-making, profiling and artificial intelligence technologies) and operations, carry out surveys and benchmarking, market our services to you, manage risk, and comply with applicable legal and regulatory requirements.

We may also share your personal data with the following categories of third parties, where relevant to your interaction with us and as permitted by applicable law:

- **Your employer or organization,** as part of providing services to you or to your employer or organization.
- **Professional advisors and service counterparties**, such as underwriters, actuaries, claims handlers, investigators, surveyors, loss adjustors or assessors, accident investigators, specialist risk advisors, pension providers or trustees, banks and other lenders (including premium finance providers), health professionals or service providers, lawyers (including parties involved in legal proceedings), accountants, auditors, tax advisors, financial institutions, investment advisors and other professional consultants or fiduciaries.
- **Business and (re)insurance partners**, such as customers, (re)insurance companies, managing general agents, brokers, other insurance intermediaries, claims handlers, insurance distributors and premium financing companies.
- **Technology, platform and system providers**, that support our Sites, services and operations, including (re)insurance broking platforms and other systems and tools we use.
- **Service providers and vendors,** such as IT, cybersecurity and cloud service providers, data hosting and Site providers, finance and payment providers, marketing and communication agencies, global technology providers, external event or venue providers, address tracing services, printers and document management and fulfilment providers, telephony providers, debt collection agencies, background check providers, credit reference agencies and compliance service providers.
- **Fraud prevention and risk management bodies,** such as fraud detection agencies, industry databases and credit bureau that operate fraud-prevention, risk-sharing or financial crime registers.
- **Industry bodies and market participants,** including (re)insurance market infrastructure providers and industry associations.
- **(Re)insurers,** including (re)insurers that are offering to or provide cover to you and those that provide (re)insurance to us.
- **Regulators, courts, public authorities and law enforcement bodies,** such as judicial bodies, supervisory or regulatory authorities, governments, quasi-governmental bodies, financial, insurance and pension regulators, and workers' compensation boards, where we are required or permitted to do so by applicable law.
- **Parties involved in corporate transactions,** such as potential or actual purchasers, transferees or counterparties in connection with mergers, acquisitions, asset sales or similar transactions.
- **Other third parties,** where you have provided your consent or where sharing is otherwise permitted or required by applicable law.

Where required by applicable law, we will obtain your consent before sharing your personal data with third parties. Where appropriate, we require third parties to implement suitable technical and organizational measures and to protect personal data in accordance with applicable data protection laws and this Privacy Notice, including through contractual safeguards. To the extent permitted by applicable law, we disclaim all liability for third parties' use of your personal data.

2.7 Children

Our Sites are not directed at children, and we do not knowingly collect personal data from children through our Sites. If you are a child, please do not submit personal data through our Sites. If you believe that a child has inadvertently provided personal data to us through our Sites, please ask a parent or guardian to contact us so that we can take appropriate steps.

Where we become aware that we have inadvertently collected personal data from a child through our Sites without appropriate authorization, we will delete that data as soon as reasonably practicable, in accordance with applicable law.

In some circumstances, we may process personal data relating to children as part of the services we provide to our clients, such as in connection with (re)insurance policies, benefit plans, pensions, claims handling or dependent or beneficiary administration. In such cases, we process children's personal data only as necessary for the provision of those services and in accordance with applicable law, and we rely on our clients or other relevant parties to obtain any required parental consent or authorization.

3. How we protect your personal data

We implement appropriate technical, organizational and administrative security measures designed to protect your personal data against unauthorized or unlawful access, use, disclosure, alteration, loss or destruction. These measures are proportionate to the nature of the personal data and the risks associated with the processing and include, for example:

- **Access controls and confidentiality obligations,** ensuring that personal data is accessed only by individuals who need it for legitimate business purposes and who are subject to confidentiality and data protection obligations.
- **Information security controls,** such as network security, system monitoring, encryption and other safeguards designed to protect our systems, Sites, and data from unauthorized access, misuse or interference.
- **Physical security measures,** including secure facilities and controls to restrict physical access to systems and locations where personal data is processed.
- **Policies, standards and procedures** governing how personal data is collected, stored, used, shared, retained and disposed of, including internal privacy, cybersecurity and information-handling requirements.
- **Additional safeguards and controls,** where required by applicable law or regulatory guidance in the jurisdictions where we operate.

Despite these measures, no system or method of transmission is completely secure. Where we provide you with, or you choose, login credentials or passwords, you are responsible for keeping them confidential and secure and for not sharing them with others.

4. How we protect your personal data when sending it internationally

We operate as a global organization and, in connection with the purposes described in this Privacy Notice, we may transfer personal data across international borders. This may include

transfers between members of the Gallagher group of companies and to third parties, such as business partners and service providers, located in countries different from the country in which you reside or in which the data was originally collected. These transfers enable us to offer and provide our services, operate our business and meet our legal and regulatory obligations.

The laws and data protection standards of the countries to which personal data is transferred may not be equivalent to that of your home country. Where we transfer personal data internationally, we do so in accordance with applicable data protection laws and implement appropriate safeguards to ensure an adequate and consistent level of protection. These safeguards may include, as required by applicable law:

- **Standard contractual clauses or equivalent contractual protections** approved by relevant data protection authorities.
- **Intragroup agreements and mandatory controls** governing transfers within the Gallagher group of companies;
- **Assessments of transfer-related risks** and the implementation of supplementary technical or organizational measures, where appropriate; and
- **Reliance on adequacy decisions** or other lawful transfer mechanisms, where available under applicable law.

We do not rely on consent for international transfers unless required by applicable law. Where consent is required, we will obtain it before transferring personal data internationally.

You may contact us using the details provided in the Contact Us section for further information about our international data transfers and the safeguards we use to protect your personal data.

5. Marketing activities

We process your personal data to communicate with you regarding our products and services, as well as those of other Gallagher group companies, where such communications may be relevant or of interest to you. Communications may be delivered through various channels, including email, telephone, mail, social media platforms (such as LinkedIn), SMS/text messages, and digital, online or personalized advertising, including targeted advertising displayed on third-party platforms. For more information on how we use your data that we collect on our Sites via cookies and similar tracking technologies for online marketing activities, please see our cookie policy.

Our marketing activities are conducted in compliance with applicable marketing, data protection and electronic communication laws. Where required by applicable law, we will obtain your consent before sending you marketing communications, including for certain direct marketing or electronic marketing activities.

You may opt out of receiving marketing communications from us at any time. You can do this by using the "unsubscribe" link included in our marketing emails, by replying STOP in response to SMS/text messages, by adjusting your communication preferences where available, or contacting us using the details set out in the Contact Us section. If you opt-out of marketing communications, we will still send you service-related or administrative communications where necessary for the provision of our services or to meet our legal or contractual obligations.

6. Automated decision-making, artificial intelligence, and profiling

As part of our commitment to innovation and operational excellence, we use personal data with artificial intelligence (AI), machine learning and automated decision-making technologies, subject to controls to safeguard your privacy rights and comply with applicable data protection and AI laws.

We and our third-party service providers use personal data with these technologies for the purposes described in this Privacy Notice. This includes providing services (such as supporting risk assessments, claims processing, policy and benefits recommendations and customer service chatbots), improving productivity and service delivery, enhancing security, developing, training, testing and improving AI models, and supporting internal business operations.

We also use personal data to evaluate risk, preferences and likely behaviors of individuals (i.e. profiling). For example, we may:

- Generate and/or apply risk scores from claims, exposure and industry benchmarks to inform coverage, pricing, quotes and risk controls.
- Analyze claims and related data to detect, prevent and investigate potential fraud.
- Conduct KYC/AML checks and sanctions screening.
- Segment audience and personalize communications and marketing (subject to your preferences).
- Support employer wellbeing and benefits programs by analyzing engagement, health risk indicators and program utilization, using de-identified or aggregated data where appropriate.
- Perform analytics and quality assurance to operate, maintain and improve our systems, models and services.

We use solely automated decision-making (decisions made without human involvement), including profiling, that has legal or similarly significant effects on you, such as determining eligibility for products or services, only where necessary by contract, where you have provided explicit consent, or as permitted or required by applicable law. Where we rely on your consent, you may have the right to withdraw such consent at any time. Subject to applicable law, you may have the right to request human review of the decision and to challenge the outcome by contacting us.

7. How long we keep your personal data

We keep personal data only for as long as necessary to fulfil the purposes set out in this Privacy Notice, considering the nature of the data, the purposes of processing, our business needs, and applicable legal, regulatory, accounting and contractual obligations. When data is no longer required, we securely delete, destroy, de-identify or aggregate it in line with our records management and data retention policies. De-identified or aggregated data is not treated as personal data under this Notice and may be retained and used for legitimate interests (e.g., analytics, research and reporting, etc.).

We maintain a records and information management framework, including a global retention schedule, that sets retention periods for different categories of information. For more details about our retention practices, please contact us using the information in the Contact Us section.

8. Your personal data rights

Depending on your country of residence, and subject to applicable laws and permitted exemptions, you may have rights regarding your personal data, such as the right to access,

correct, delete, restrict its use, or object to certain processing. We respect and facilitate these rights in accordance with applicable data protection laws. Please refer to your country-specific addendum to this Privacy Notice for details on the rights available in your jurisdiction.

You may exercise your rights by contacting us using the details in the Contact Us section. We will respond within legally required timeframes and generally do not charge a fee unless permitted by applicable law. In some cases, we may be unable to fulfill a request (for example, where a legal exemption applies or fulfilling it would conflict with other legal obligations); if appropriate, we will explain the reason.

9. Contact us

If you have any questions about how we collect or process your personal data, or if you wish to exercise your data protection rights, please contact us at DPO@ace-gallagherre.com. To help us respond more efficiently, please include details of:

- the Gallagher business you interact with; and
- the country applicable to your request.

10. Updates to this Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in our practices, legal requirements or business operations. When we make updates, we will post the revised version on our Sites and update the "last updated" date at the beginning of this Privacy Notice.

We encourage you to review this Privacy Notice periodically so that you are aware of how we protect and use your personal data.

11. Kingdom of Saudi Arabia Addendum ("Addendum") to the Gallagher Global Privacy Notice

Updated: 27 October 2026

This Addendum adds to Gallagher's Global Privacy Notice and covers personal data collected or used in the Kingdom of Saudi Arabia ("Saudi Arabia"). It reflects the requirements of the Saudi Personal Data Protection Law (the "PDPL") and the rules made under it by the Saudi Data & Artificial Intelligence Authority ("SDAIA"). Where relevant to insurance activities, the rules of the Insurance Authority ("IA") also apply. If anything in this Addendum differs from the Global Privacy Notice, this Addendum applies.

International Transfers of Personal Data

The Global Privacy Notice explains how we protect your data when we send it to other countries in Section 4. Under the PDPL, we will only transfer personal data outside Saudi Arabia where adequate safeguards are in place, such as an SDAIA adequacy finding, suitable contractual protections, or your explicit consent. For insurance placements, this may include sharing data with international insurers, reinsurers and claims handlers. We will not transfer data outside Saudi Arabia where doing so would harm national security.

Purposes and Legal Grounds for Processing

As a licensed insurance broker in Saudi Arabia, we may also use your personal data to meet IA rules.

Purposes of Processing	**Legal Grounds for Processing**
To perform services for you or our clients.	For the performance of contracts to which you will be a party and in order to take steps at your request prior to you entering into those contracts; or For the purposes of legitimate interests pursued by us (to perform and enter into services for our clients).
To manage our business operations.	To comply with a legal or regulatory obligation to which we are subject; or For the performance of contracts to which you will be a party and in order to take steps at your request prior to you entering into those contracts; or For the purposes of legitimate interests pursued by us (to manage our business operations).
To communicate and market to you.	Your consent to this processing; or For the purposes of legitimate interests pursued by us (to communicate and market to you where we do not require your consent).
To comply with legal obligations.	To comply with a legal or regulatory obligation to which we are subject.
To monitor and prevent fraud or wrongdoing.	To comply with a legal or regulatory obligation to which we are subject; or For the performance of contracts to which you will be a party and in order to take steps at your request prior to you entering into those contracts; or For the purposes of legitimate interests pursued by us (to monitor and prevent fraud or wrongdoing or defend or protect our legal rights).
To improve our services.	For the purposes of legitimate interests pursued by us (to improve our services).

To manage mergers, acquisitions, sales, re-organizations, disposals and integrations.	For the purposes of legitimate interests pursued by us (to manage mergers, acquisitions, sales, re-organizations, disposals and integrations).

Sensitive personal data

The Global Privacy Notice lists the types of personal data we collect in Section 2. For the purposes of the PDPL, data relating to security, criminal convictions and offences is also treated as sensitive personal data.

Your personal data rights

You have certain rights in respect of your personal data under the PDPL and the implementing regulations, as set out below. These rights are subject to exceptions and limitations under applicable law.

Right to access your personal data

You have a right to access your personal data, ask us for copies of your personal data in a readable and clear format, and certain details of how we use it.

Right to rectification

You have a right to ask us to amend or update your personal data if you believe the personal data we hold about you is inaccurate or incomplete.

Right to destruction

You have a right to ask us to destroy your personal data in certain circumstances, such as where you withdraw consent or where the personal data we collected is no longer necessary for the original purpose. This will be balanced against other factors. For example, we may have regulatory and/or legal obligations which limit our ability to comply with your request.

Requests relating to the limitation or cessation of processing:

Subject to applicable law and the circumstances of the processing activity, you may request that we review whether the processing of your personal data can be limited, suspended, or ceased. We will assess such requests in accordance with the PDPL, its Implementing Regulations, and any applicable legal or regulatory obligations.

Right to withdraw consent

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

Right to complain

You have the right to contact us if you have any concerns with how we use your personal data and we will do our best to resolve your concerns. You also have a right to lodge a complaint with the Saudi Data & Artificial Intelligence Authority ("SDAIA"), which is the competent authority responsible for supervising and enforcing the PDPL, if you believe that

our processing of your personal data is in breach of the PDPL, its Implementing Regulations or other applicable data protection laws and/or regulations. More information can be found on the SDAIA's website. Exercising this right will not affect any other legal rights or remedies you have.

There may be circumstances where exercising some of your rights described above or not providing us with personal data will result in us not being able to provide products or services to you (i.e., insurance can no longer be provided or your policy may be cancelled). By exercising your rights (such as your right to destruction), you may also lose the right to bring any claim or receive any benefit, including in relation to any event that occurred prior to the exercise of your rights, 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.

Contact us

You can contact us if you have any questions about how we collect, store or use your personal data or if you wish to exercise any of your rights with respect to your personal data. To assist in providing you with an accurate response, please let us know the Gallagher business you interact with and your applicable country.

Gallagher legal entity	**Contact details**
Gallagher Reinsurance Brokers Limited	Data Protection Office 6729 King Saud Rd, As Safa Dist. Eastern Province, Dammam, 34222 Saudi Arabia Phone: +966 541298449 Email: DPO@ace-gallagherre.com