



Argenta

Privacy Policy

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1. Introduction

- 1.1 This privacy policy is to let you know how and why we collect and use personal data and provides information about individual's rights about their personal data. Personal data is any information relating to an identified or identifiable living person. We process personal data for certain purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose may differ.

2. Who we are

- 2.1 Argenta Holdings Limited is made up by a group of different legal entities. This privacy policy applies to the following businesses within Argenta Holdings:

Argenta Group provides services through a number of different subsidiaries focused on the Lloyd's market in London.

Argenta Syndicate Management Limited (ASML) is a Lloyd's Managing Agency, housing the Group's own underwriting operation, Argenta Syndicates 2121 and SPA 6134. ASML is authorised and regulated by Lloyd's, the Financial Conduct Authority (**FCA**) and the Prudential Regulation Authority (**PRA**).

Argenta Private Capital Limited (APCL) specialises in creating and managing tailor-made underwriting vehicles for both individual and corporate Members of Lloyd's investors. APCL is authorised and regulated by Lloyd's and the FCA.

Argenta Tax & Corporate Services Limited (ATCSL) is a specialist provider of accounting, tax structuring and company secretarial services, typically (but not uniquely) to clients of APCL. ATCSL is supervised by the Institute of Chartered Accountants in England and Wales (**ICAEW**).

- 2.2 When we refer to **Argenta** in this policy, this includes all of the companies listed above.
- 2.3 Each of the above listed companies are 'data controllers' in their own right. A data controller means the person or organisation who decides the purposes and the ways in which any personal data is processed.
- 2.4 The Data Protection Officer for Argenta can be contacted by writing to the below address or by emailing: dpo@ArgentaGroup.com
- 2.5 The above companies are all incorporated and registered in England and Wales at the following address:

5th Floor
70 Gracechurch Street
London EC3V 0XL

3. How the law protects you

- 3.1 Data Protection law (comprising of the EU General Data Protection Regulation (**GDPR**) and UK Data Protection Act 2018) says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Argenta. The law says we must have one or more lawful reasons to process your information. The lawful reasons we rely on are:

- To fulfil a contract we have with you or taking specific steps before entering into a contract;
- When it is our legal or regulatory duty;
- When it is in our legitimate interest; or
- When you consent to it.



3.2 A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

4. What we use your information for

4.1 Our policy is to collect only the personal data necessary for agreed purposes and we ask our clients to only share personal data where it is strictly needed for those purposes.

4.2 Where we need to process personal data to provide professional services to corporate clients, or through intermediaries, we ask our clients or intermediaries to provide the necessary information to the data subjects regarding its use. Our clients and intermediaries may use relevant sections of this privacy policy or refer data subjects to this privacy policy if they consider it appropriate to do so.

4.3 Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal information for	Our lawful reasons	Our legitimate interests
Servicing our customers/clients		
<ul style="list-style-type: none"> - Managing our relationship with you or your business - Developing and carrying out any marketing activities - Understanding how you use our products and services - Communicating with you about our products and services 	<ul style="list-style-type: none"> - Your consent - Fulfilling contractual obligations - Our legitimate interests - Meeting our legal duty and regulatory responsibilities 	<ul style="list-style-type: none"> - Keeping our records up to date, working out which of our products and services may interest you and telling you about them - Developing products and services, and what we charge for them - Defining types of customers for new products or services - Seeking your consent when we need it to contact you - Being efficient about how we fulfil our legal and contractual duties
Business improvement		
<ul style="list-style-type: none"> - To test new products - To manage how we work with other companies that provide services to us and our customers - To develop new ways to meet our customers' needs and to grow our business 	<ul style="list-style-type: none"> - Fulfilling contractual obligations - Our legitimate interest - Meeting our legal duty and regulatory responsibilities 	<ul style="list-style-type: none"> - Developing products and services, and what we charge for them - Defining types of customers for new products or services - Being efficient about how we fulfil our legal and contractual duties
Managing our operations		
<ul style="list-style-type: none"> - To deliver our products and services - To make and manage payments - To manage fees and charges - To collect and recover money that is owed to us in the normal course of business 	<ul style="list-style-type: none"> - Fulfilling contractual obligations - Our legitimate interest - Meeting our legal duty and regulatory responsibilities 	<ul style="list-style-type: none"> - Being efficient about how we fulfil our legal and contractual duties - Complying with rules and guidance from regulators



What we use your personal information for	Our lawful reasons	Our legitimate interests
Managing security, risk and crime prevention		
<ul style="list-style-type: none"> - To detect, investigate, report, and seek to prevent financial crime - To manage risk to us and our customers - To obey laws and regulations that apply to us - To respond to complaints and seek to resolve them 	<ul style="list-style-type: none"> - Fulfilling contractual obligations - Our legitimate interest - Meeting our legal duty and regulatory responsibilities 	<ul style="list-style-type: none"> - Developing and improving how we deal with financial crime, as well as doing our legal duties in this respect - Complying with rules and guidance from regulators - Being efficient about how we fulfil our legal and contractual duties
Business management		
<ul style="list-style-type: none"> - To run our business in an efficient and proper way. This includes managing our financial position; business capability; planning; adding and testing systems and processes; managing communications; corporate governance; and audit - To exercise our rights set out in agreements or contracts 	<ul style="list-style-type: none"> - Our legitimate interests - Our legal duty - Fulfilling contractual obligations 	<ul style="list-style-type: none"> - Complying with rules and guidance from regulators - Being efficient about how we fulfil our legal and contractual duties
For processing special categories of personal data		
<ul style="list-style-type: none"> - Substantial public interest 	<ul style="list-style-type: none"> - Using criminal records data to help prevent, detect, and prosecute unlawful acts and fraudulent behaviour - Using criminal and health information as needed to provide affordable and accessible insurance products 	
<ul style="list-style-type: none"> - Responding to regulatory requirements 	<ul style="list-style-type: none"> - Showing whether we have assessed your situation in the right way - Passing information to the regulator as needed to allow investigation into whether we have acted in the right way 	
<ul style="list-style-type: none"> - Legal claims 	<ul style="list-style-type: none"> - Using any special categories of data as needed to establish, exercise or defend legal claims 	
<ul style="list-style-type: none"> - Consent 	<ul style="list-style-type: none"> - Telling you that we need your consent to process special categories of personal data, when that is what we rely on for doing so 	

5. Groups of Personal Information

5.1 The below table explains what all the different types of personal information mean that are covered by data protection law.

5.2 We use many different kinds of personal information, and group them together into categories. The categories are all listed here so that you can see what we may know about you. We don't use all this data in the same way. Some of it is useful for marketing within the Argenta Group, although the principal purpose is in the provision of services to you. Some of the data is private and sensitive and we treat it that way.



Types/categories of personal information	Description
Contact information	Your name, address, email address, telephone numbers
Financial	Your financial position, status and history
Socio-demographic	This includes details about your work or profession, nationality and where you fit into general social or income groupings
Transactional	Details about payments relating to the normal course of business activities
Contractual	Details about the products or services we provide to you
Locational	Data we obtain about where you are. This may come from your mobile phone or the place where you connect a computer to the internet
Behavioral	Details about how you use products and services from us, and investment risk appetite
Communications	What we learn about you from letters and emails you write to us and conversations between us
Social Relationships	Your family, friends and other relationships
Open Data and Public Records	Details about you that are in public records, such as Companies House, and other information about you that is openly available on the internet
Documentary Data	Details about you that is stored in documents in different formats, or copies of them. This could include things such as your passport, driver's license, utility bills, or bank statements
Special types of data	The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if there is a legal basis which allows us to do so: <ul style="list-style-type: none">- Racial or ethnic origin- Religious, political or philosophical beliefs- Trade union membership- Genetic and bio-metric data- Health data- Lifestyle information, including data related to sexual orientation- Criminal records of convictions and offences
Consents	Any permissions, consents or preferences that you give us. This includes things like how you want us to contact you, whether you get paper statements, or prefer large-print formats
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance number or Tax Identification Number

6. Where we collect personal information from

6.1 If you intend to give us information on behalf of someone else you must ensure that they have been provided with this Privacy Policy before doing so.

6.2 Our products and services are not marketed towards children. However we may need to collect children's information in certain situations, such as in the event of a claim or if they are intended to be beneficiaries in relation to any services provided or facilitated by Argenta. In the event that we do request children's information, this will be done directly from a parent or legal guardian.

6.3 We may collect personal information about you (or your business) from other companies within Argenta Group and from these sources:

6.3.1 Data you give to us:

- When you apply for our products and services
- When you talk to us on the phone
- When you use our website
- In emails and letters
- In insurance claims or other documents
- In financial / portfolio reviews and interviews.



6.3.2 Data we collect when you use our website (including our e-newsletter subscription service):

- Usage data in respect of our use cookies while you are using our website. You can find out more about this in our cookies policy at www.argentagroup.com/cookies.
- Analytics – e.g. how visitors use our website. We use Google Analytics to store information about how visitors use our website so that we may make improvements and give visitors a better user experience. Google Analytics is a third-party information storage system that records information about the pages you visit, the length of time you were on specific pages and the website in general, how you arrived at the site and what you clicked on when you were there. You can view their privacy policy here <https://policies.google.com/privacy?hl=en&gl=uk>.
- IP addresses. An IP (or Internet Protocol Address) is a unique numerical address assigned to a computer as it logs on to the internet. Argenta does not have access to any personal identifiable information and we would never seek this information. Your IP address is logged when visiting our site, but our analytic software only uses this information to track how many visitors we have from particular regions.

6.4 We also collect information about you when you subscribe to our online Private Capital News mailing list. We use a third party provider, MailChimp, to deliver our e-newsletter (see also 11.2). We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see MailChimp's privacy notice at <https://mailchimp.com/legal/privacy/>. Website usage information is collected using cookies.

6.5 Data from third parties we work with:

- Companies that introduce you to us
- Financial advisers
- Insurers, or insurance intermediaries
- Fraud prevention agencies
- Payroll service providers
- Public information sources such as Companies House
- Agents, suppliers, sub-contractors and advisers
- These can be types of firm we use to help us run accounts and services. They can also be specialist companies who advise us on ways to develop and improve our business.
- Medical professionals ¹
- Government and law enforcement agencies.

¹ For some insurance products, we may ask your GP or other medical professional to send us a report. We will only do this if we get your consent first.

7. Who we share your personal information with

7.1 We may share your personal information with outside organisations such as Lloyd's, reinsurers or tax authorities. This is so that we can provide you with products and services, run our business, and obey rules that apply to us. Here we list all the types of organisation that we may share your personal information with.

7.1.1 Argenta Group - We may share your information with other companies within the Argenta Group.

7.1.2 Authorities - This means official bodies that include:

- Central and local government
- HM Revenue & Customs, regulators and other tax authorities
- UK Financial Services Compensation Scheme and regulatory bodies such as the FCA, PRA and Lloyd's
- Law enforcement and fraud prevention agencies



7.1.3 Banking & Financial Services - Outside companies we work with to provide services to you and to run our business:

- Agents, suppliers, sub-contractors and advisers (these are types of firm that we use to help us run accounts, policies and services)
- Agents who help us to collect what is owed to us
- Someone linked with you or your business's product or service (this could mean a joint account holder, trustee, or fellow company director)
- Other financial services companies (to help prevent, detect and prosecute unlawful acts and fraudulent behaviour)
- Independent Financial Advisers (this could be someone who advises you on things like tax. We won't share any personal information unless they have your consent to ask us for it)
- Employers
- Companies you ask us to share your data with

7.1.4 Insurers ² - We share personal information with insurance industry companies to process claims and help reduce fraud. We do that in these ways:

- If you apply for insurance with us, we may share your personal or business details with reinsurers.
- If you make an insurance claim, information you provide may be put on a register of claims. This will be shared with other insurers, our agents, suppliers and sub-contractors.
- If you are seeking to participate in the Lloyd's insurance market (whether as a private client or trade investor), we may share you details with Lloyd's and any syndicates selected in respect of your underwriting decisions.

² Argenta's main business activities are focused on the Lloyd's insurance market in London. Insurance involves the use and disclosure of your personal data by various insurance market participants such as intermediaries, insurers and reinsurers. The London Insurance Market Core Uses Information Notice sets out those core necessary personal data uses and disclosures. Our core uses and disclosures are consistent with the London Market Core Uses Information Notice. We recommend you review this notice which can be accessed here: <https://www.londonmarketgroup.co.uk/gdpr>

7.1.5 General business - Outside companies we use to help grow and improve our business.

- Organisations that introduce you to us
- Advisers who help us to come up with new ways of doing business (This might be a legal firm, IT supplier or consultancy)

7.1.6 Company mergers and takeovers

- We may choose to sell, transfer, or merge parts of our business, or our assets. Or we may seek to acquire other businesses or merge with them.
- During any such process, we may share your data with other parties. We'll only do this if they agree to keep your data safe and private
- If there is a change to our Group structure, then other parties may use your data in the same way as set out in this policy

8. How we use your information to make automated decisions

8.1 We sometimes use systems to make automated decisions based on personal information we have – or are allowed to collect from others – about you or your business. This helps us to make sure our decisions are quick, fair, efficient and correct, based on what we know.



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8.2 We use automated decisions for insurance pricing, where we will compare what you tell us with other records to work out how likely you are to make a claim. This will help us decide whether to offer you the product and what price to charge you and is necessary for entering into a contract of insurance.

9. Fraud Prevention Agencies (FPAs)

9.1 We may need to confirm your identity before we provide products or services to you or your business. Once you have become a customer of ours, we will also share your personal information as needed to help detect fraud and money-laundering risks. We use FPAs to help us with this.

9.2 Both we and FPAs can only use your personal information if we have a proper reason to do so. It must be needed either for us to obey the law, or for a 'legitimate interest'. A legitimate interest is when we have a business or commercial reason to use your information. This must not unfairly go against what is right and best for you.

9.3 We will use the information to:

- Confirm identities
- Help prevent fraud and money-laundering
- Fulfil any contracts you or your business has with us.

9.4 We or an FPA may allow law enforcement agencies to access your personal information. This is to support their duty to detect, investigate, prevent and prosecute crime. FPAs can keep personal information for different lengths of time. They can keep your data for up to six years if they find a risk of fraud or money-laundering.

10. The information we use

10.1 These are some of the kinds of personal information that we use:

- Name
- Date of birth
- Residential address
- History of where you have lived
- Contact details, such as email addresses and phone numbers
- Financial data
- Data relating to your or your businesses products or services
- Employment details
- Data that identifies computers or other devices you use to connect to the internet. This includes your Internet Protocol (IP) address.

11. Sending data outside of the European Economic Area (EEA)

11.1 We will only send your data outside of the EEA to:

- Follow your instructions.
- Comply with a legal duty.
- Work with our agents and advisers who we use to help run your accounts and services.

11.2 If we do transfer information to our agents or advisers outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. We'll use one of these safeguards



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- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more on the European Commission Justice website at https://ec.europa.eu/info/law/law-topic/data-protection_en.
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA.
- Transfer it to organisations that are part of Privacy Shield (see www.privacyshield.gov/welcome). This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA. An example of an active participant in Privacy Shield is MailChimp (see 6.4. above).

12. If you choose not to give personal information

- 12.1 We may need to collect personal information by law, or under the terms of a contract we have with you.
- 12.2 If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to provide our services to you or run policies. It could mean that we cancel a product or service you have with us.
- 12.3 Any data collection that is optional would be made clear at the point of collection.

13. Marketing

- 13.1 We may use your personal information to tell you about relevant products and offers in relation to Argenta Group. This is what we mean when we talk about 'marketing'.
- 13.2 We do not sell your data to other companies for marketing purposes.
- 13.3 The personal information we have for you is made up of what you tell us and data we collect when you use our services, or from third parties we work with. We study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.
- 13.4 We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.
- 13.5 You can ask us to stop sending you marketing messages by contacting us at any time.

14. How long we keep your personal information

- 14.1 Your personal data will not be kept for longer than is necessary and for the purpose or purposes for which the personal data are processed. We will keep your personal information for the duration of your relationship with Argenta and any subsequent limitations period that apply under contracts or agreements.
- 14.2 After you stop being a customer and all transactions (including reporting) have ceased, we may keep your data for up to 12 years for one or more of these reasons:
- To respond to any questions or complaints
 - To show that we treated you fairly
 - To maintain records according to rules that apply to us
- 14.3 We may keep your data for longer than 12 years if we cannot delete it for legal, regulatory or technical reasons.



15. Security precautions in place about data collected

- 15.1 When you give us personal information, we take steps to make sure that it's treated securely. Any sensitive information is kept secure in access controlled areas and is encrypted when being transmitted to third parties for the purpose of fulfilling our contractual obligations to you. You will never be prompted to provide sensitive information (such as payment or banking information) on our website.
- 15.2 We use an IT standard encryption called Transport Layer Security (**TLS**). It works by firstly sending a message to the recipients email gateway to request a link and the request is then accepted. This happens before the email is sent in order for it to be delivered to the correct recipient. It also sends a key, and encrypts the email, (which means the characters are all nonsense). When received by the recipient's server, TLS uses the key to decrypt the message.

16. Your individual rights over personal information

- 16.1 Your individual rights can be exercised by contacting us by post or phone using the contact details provided. We will need to confirm your identity before processing a request. If you are unable to provide satisfactory proof of your identity we have the right to refuse a request.

16.1.1 Right to access a copy of your personal information

You can request a copy of the personal information that we hold about you, free of charge. This is generally known as a 'Subject Access Request' and we normally have one month to respond.

If you would like a copy of some or all your personal information, please email or write to us at the following address: Data Protection Officer, 5th Floor, 70 Gracechurch Street, London EC3V 0XL, or by emailing dpo@ArgentaGroup.com.

16.1.2 Right to request rectification of your personal information

We take reasonable steps to keep your information accurate, complete and current but you can also ask us to change any information we hold about you to ensure that this is the case. However, please remember that it is your responsibility to tell us about any updates to this information.

16.1.3 Right to request erasure of your personal information

In certain circumstances, you have the right to ask us to erase the personal information we hold about you, for example, if you withdraw your consent to our processing of your personal information; your personal information is no longer necessary for the purposes it was collected for; or your personal information has been processed unlawfully. Where there are legitimate reasons that we must retain some of your personal information after you have requested its erasure, appropriate organisational and technical controls will remain in place. Such reasons include for compliance with a legal or regulatory obligation to which we are subject, or for the establishment, exercise or defence of legal claims.

16.1.4 Objections to processing of personal data

It is your right to lodge an objection to the processing of your personal data if you feel there are adequate grounds relating to your particular situation. The only reasons we will be able to deny your request is if we can show compelling legitimate grounds for the processing, which override your interest, rights and freedoms, or the processing is for the establishment, exercise or defence of a legal claims.



16.1.5 Right to request restriction on our processing of your personal information

You can request that we restrict our processing of your personal information where:

- you contest the accuracy of the information we hold (restricted until it has been verified);
- it was processed unlawfully and you wish to restrict our processing, as opposed to requesting its erasure; or
- we no longer need the personal information but you need us to retain it for the establishment, exercise or defence of a legal claim.

Where a restriction is in place, we can continue to store your information but only process it with your consent or for the establishment, exercise or defence of legal claims; for the protection of another individual's rights; or for important public interest reasons. We will inform you prior to the lifting of any restriction.

16.1.6 Data Portability

In certain circumstances, where technically feasible, you have the right to receive personal information in a structured, commonly used and machine-readable format and have the right to transmit such personal information to another data controller, if the processing is based on consent and is carried out by automated means.

17. **How to exercise your rights**

Should you like to make a request relating to your personal information rights as detailed above please contact us via:

- Email: dpo@ArgentaGroup.com, or
- Post: Data Protection Officer, 5th Floor, 70 Gracechurch Street, London EC3V 0XL

18. **Right to withdraw consent for optional processing**

You may at any time withdraw consent for any optional uses of your information to which you have previously consented.

19. **Other websites**

Our website contains links to other websites. This privacy policy only applies to Argenta so when you link to other websites you should read their own privacy policies.

20. **Complaints**

If you feel that your personal data has been processed in a way that does not meet the applicable requirements under the relevant data protection laws, you have a specific right to lodge a complaint with the Information Commissioner's Office (ICO). The ICO can be contacted via their website at ico.org.uk.

21. **Changes to our Privacy Policy**

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 25th May 2018.

22. **How to contact us**

Please contact us if you have any questions about our privacy policy or information we hold about you:

- Email: dpo@ArgentaGroup.com, or
- Write to: Data Protection Officer, 5th Floor, 70 Gracechurch Street, London EC3V 0XL