

## RiskTrEx Privacy Policy

Risk Transfer & Exchange Ltd. (the 'Company') respects the privacy of registered Firms, Users and Super Users (collectively referred to as "Users"), with regard to the collection, storage, access, and use of identifiable data collected online. The Company has a privacy policy aiming to properly reflect our information and use practices. Registering your Firm and the Super User who administers the Firm's User accounts is deemed acceptance of this Privacy Policy.

### 1. Scope and Information Flows

We operate a platform ('RiskTrEx') which represents an open (B2B) Business Insurance exchange which functions because of information flows between trading partners. As such, Users are advised that their use of RiskTrEx will be tracked and evaluated to assure that there is no misuse of the platform.

RiskTrEx hosts multiple communities that wish to participate in an exchange. Maximizing the number of users creates a more varied and valuable experience for each of them. It also provides a highly effective environment for users to efficiently carry out activities such as business insurance risk creation, marketing, quotation and reaching contract certainty.

Users should be aware that trading and collaborating on any exchange requires the transfer of information between Users. Information on RiskTrEx use and transactions will be maintained by the Company. It is our aim that only the Firm's Super User (and User, where appropriate) will be able to access the confidential information posted unless voluntarily shared by that User with other Users on the platform.

### 2. Types of Data Collection

Data collected is either used by the Company to administer the User's account or used by the User himself as part of the information exchange necessary to do business with his counterparties. RiskTrEx allows for the following data to be input by Users:

1. Firm and User Registration data
2. Policyholder Risk data
3. Quote data
4. Messages between Users and RiskTrEx
5. Documents (Public and Restricted)

### 3. How We Use Information

RiskTrEx requires users to provide both Firm and individual User information during the registration process. Where we collect information, we will use it for administration and to tailor our service and/or

products to match your needs. We may also use information for statistical analysis to determine site usage and for marketing purposes relating to our business.

Users create their Personal and Business Profiles which are used for counterparty matching according to the Users' instructions. Users then input data which allows them to market risks and quote for risks with the aim of reaching transactional agreement relating to Business Insurance placement. The only counterparties who are permitted to see (receive) any information generated by a User are those selected by him through a process of invitation and acceptance to be on his Panel (main Panel or Risk Panel, as the case may be).

Additional site use information may be gathered as Users navigate RiskTrEx and perform transactions for use by the Company to improve its services.

We may employ the services of a third party to help us in certain areas, such as website hosting, marketing and market researching. In some cases that third party may receive your information appropriately anonymised. However, at all times we will control and be responsible for the use of your information.

#### **4. Account Access**

RiskTrEx recognizes two levels of access for users from a Firm: Super Users (responsible for setting up and administering User accounts) and Users (authorized to participate on RiskTrEx and whose accounts are controlled by a Super User). At any time, a User can edit his or her own personal information and view his or her own transactional activity.

Each Super User has the administrative right of access to all user accounts for his firm. A Super User's right of access includes, but is not limited to, the ability to update company information, approve new User accounts, and view or update Users' transactions. Super Users can receive aggregated information on all subordinate Users and also take over a User account by logging in as a User.

#### **5. Marketing**

The Company will not use personal information provided in the registration process for marketing purposes. The Company does not permit any sponsorships and advertisements on its websites. There are also no links on RiskTrEx to external websites.

#### **6. Protecting Your Information**

We will hold your personal information securely and will only keep it for as long as is reasonably necessary in the circumstances you are registered to use the Website or for as long as you use the service that you have requested, unless you have provided us with your consent to use the data for any additional purposes.

We take the security of the Website and the information you provide very seriously and we will take all appropriate technical measures using recognized security procedures and tools in accordance with good

industry practice to protect your personal information. Whilst we will use all reasonable endeavours to protect your security, we advise Users that data transmission over the Internet and the World Wide Web cannot always be guaranteed as 100% secure, and therefore that you use the Website at your own risk.

## **7. Security**

RiskTrEx is concerned with the security of User data it collects and has put in place measures to prevent unauthorized access to that information. Information is protected during transmission from the User by a Secure Sockets Layer (SSL) connection and, once stored, is protected through various security measures in place at the RiskTrEx data center. These measures include both policies relating to access to information and technological elements such as firewalls.

## **8. Updates to the Privacy Policy**

RiskTrEx is sensitive to the privacy issues of its users, and recognizes the need to update this policy as new features and business services are offered on RiskTrEx. All users will be notified by email of material changes to this Privacy Policy prior to the change date.

If you have any questions about the RiskTrEx Privacy Policy, please contact us at [admin@risktrex.com](mailto:admin@risktrex.com)