PRIVACY AND COOKIES NOTICE

Our Privacy Policy

Important information and who we are

Square Pegs is a trading name of Ryan Specialty Underwriting Managers International Limited. This Website Notice applies to our website visitors, former, current and prospective clients, suppliers, service providers, insureds, insurers, insurance brokers and agents, syndicate representatives and any other individuals who communicate or engage with us in respect of our products and services in the UK, EMEA and APAC.

When we refer to "**Ryan Specialty**", "**the Company**", "**we**", "**us**" or "**our**" in this Notice, we are referring to the Ryan Specialty entity with which you have engaged or have dealings. This Notice does not form part of any contract to provide services or any other contract we have entered or may enter into with you. This Notice underlines our commitment to protect and respect your privacy and your data rights, as required by relevant law (in the EEA, the General Data Protection Regulation (the "**GDPR**") and in the UK, the "**UK GDPR"**), as well as under other applicable data protection law in your country).

If there is anything you do not understand after reading this Notice, please contact us on Legalinternational@ryansg.com.

Layered approach
We use a layered approach to delivering information about data protection through:

- A brief privacy notice in policy documentation when we issue your policy, which will refer to in this more detailed privacy policy notice; and
- Our external Website and Client Privacy Notice accessible online.

This privacy policy covers the following areas of our data protection and privacy practices:

1. Information we may collect about you
2. Why we collect personal data
3. Sharing and safeguarding your personal data
4. Retention of your personal data
5. Your rights
6. Contacting us
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1. Information we may collect about you

We may collect and process the following personal data about you:

- information provided to us through enquiry, application or claims forms, including:
- identity and contact information such as your name, address or contact details;
- sensitive information (e.g. details of any criminal or fraudulent behaviour or medical
- information) obtained either through you or third parties;
- communication data such as we may maintain records of any correspondence with you including emails and phone records;
- details of your access to and use of our portal, including IP addresses, login data, browsing and search history and cookies information;
- any other personal data you voluntarily provide to us.

2. Why we collect personal data

We are required by data protection laws to have a lawful basis or bases to process and use your personal data. The main purpose for processing your personal data is for the necessary provision and performance of an insurance contract e.g. reviewing your application, setting you up as a policyholder, administration and maintenance of your insurance policy or in order to process a valid claim

Anonymous data

We may create anonymous and aggregated data sets and reports in order to assess, improve and develop our business, products and services, prepare benchmarking reports on our industry and for other research, marketing and analytics purposes. We may also share this anonymised data with third parties. Since this data will not identify you or make you identifiable, it will not constitute personal data.

With regards to 'Special Category' data i.e. sensitive information, we must obtain your consent at the point of collecting your personal data (i.e. when you input your details online or when completing a form) in order to process the data unless exemption for insurance purposes is applicable. In the limited circumstances where we do process such personal data, we do so where it is:

(a) required to deal with your application for insurance and your insurance claims or

(b) dealing with any legal claims or requests from courts, governmental or regulatory authorities.

In some circumstances, if we do not have your consent to process your data, it may impact our ability to issue you with insurance cover or to handle any claims.

We may also gather personal data for the following purposes:

- in order to prevent, identify and investigate fraud, money laundering, financial crime or any activity that is in the public interest;
- to establish and exercise our legal rights or defend ourselves against or make any legal claims;
- to manage enquiries, disputes and complaints;
- to protect the property, rights and interests of us and our clients;
- where we have a legitimate business interest in processing your data e.g. for maintaining our accounts and records, gathering market intelligence in order to develop and improve

our products and services. We will ensure that the processing of your personal data is proportionate and does not affect your rights under applicable data protection laws;

- to comply with a legal, governance, compliance or regulatory obligation e.g. where we are required to maintain records of any transactions with you, or for compliance with international legal and regulatory authorities; and
- where we have an appropriate business need to use your information which does not cause any harm to your interests such as keeping you informed of our product range and providing you with market commentary, subject to your communication preferences and applicable law.

3. Sharing and safeguarding your personal data

All personal data supplied to us is stored on secure servers and only accessed and used in line with our data protection policies and procedures. Your personal data will only be accessed by our employees, group companies, or authorised third parties who require the information for their business purposes. In circumstances where it is necessary to share your personal data with a third party, there are contractual agreements in place to ensure the security and confidentiality of your personal data and the information will only be used for the specific purpose for which it has been provided to them.

Our group companies

We may share your personal data with our group companies, but only for the purposes outlined out in this privacy policy and we will ensure the security of your personal data.

Authorised third parties

We or our group companies may also be required to allow authorised third parties, including service providers and suppliers, access to your personal data, for the purposes stated in section 2 of this notice. Any data sharing with third parties will be in compliance with applicable data protection laws.

Governmental, legal and regulatory authorities

It may be necessary for us to share your personal data with financial and regulatory organisations (e.g. the Financial Ombudsman Service, the Financial Conduct Authority, the Information Commissioner's Office) or law enforcement agencies (including courts) in order to assist them with enquiries, investigations or proceedings and ensure our compliance with our regulatory and legal requirements. As a financial services company, we are required to have certain processes in place with regards to anti-bribery and corruption, money laundering and fraud. If any criminal offence is detected or suspected, we may share data with third parties (e.g. law enforcement agencies, fraud prevention agencies, anti-money laundering agencies) in order to prevent crime or aid investigations if crime is identified. We may also access this data as part of our 'Know Your Client' procedures to establish the parties we are dealing with and when assessing a claim payment in order to prevent criminal offences.

International transfers

We, our group companies, (or third parties acting on our behalf) may store or process information that we collect about you in countries outside the European Economic Area (EEA) or the United Kingdom. Where we make a transfer of your personal information outside of the EEA or the United Kingdom we will take the required steps to ensure that your personal information is protected through compliance with applicable data protection legislation. Either the relevant country's data protection laws will have been approved by the UK government or European Commission (as applicable) as being adequate to protect your personal data or we will ensure other appropriate safeguards are in place, such as (as applicable) the UK's International Data Transfer Agreement or Addendum or the European Commission's

Standard Contractual Clauses. If you would like further information regarding the steps we take to safeguard your personal information, please contact us.

4. Retention of your personal data

We will only keep your personal data for as long as is reasonably necessary for the relevant purposes set out in this privacy policy or when we are obliged to do so in order to comply with legal or regulatory requirements. The amount of time we retain your data for depends on the nature of the personal data, the purpose for which it was collected and any legal or regulatory requirements that apply and what we require it for. When your personal data is no longer required, we will ensure it is securely deleted.

5. Your rights

Our policy complies with the UK General Data Protection Regulation, EU General Data Protection Regulation where applicable, and other relevant data protection legislation. The law requires us to tell you about your rights and our obligations with regards to the processing and control of your personal data, however not all of the following may be applicable in our business dealings:

- The right to be informed;
  https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/right-to-be-informed/
- The right to access your personal data;
  https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/right-of-access/
- The right to rectification;
  https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/right-to-rectification/
- The right to erasure;
  https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/right-to-erasure/
- The right to restrict processing;
  https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/right-to-restrict-processing/
- The right to data portability;
  https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/right-to-data-portability/
- The right to object to processing;
  https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/right-to-object/
- The right to withdraw consent;
  https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/a-guide-to-lawful-basis/lawful-basis-for-processing/consent/
- Rights related to automated decision-making including profiling.
  https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/rights-related-to-automated-decision-making-including-profiling/

There are some circumstances where we may be required to restrict your rights in order to safeguard the public or our own interests. For further information regarding your rights, please visit the Information Commissioner's Office's website https://ico.org.uk/ or click on the links or provided above.

6. Contacting Us

If you have any questions regarding privacy or how we use personal data, you may contact our Data Protection Officer via email on Legalinternational@ryansg.com and via post:

25 Fenchurch Avenue
London

EC3M 5AD

7. Changes to our privacy policy

We may change our privacy policy from time to time and any changes will be displayed on this page. This privacy policy was last updated in July 2026.

8. Cookies

- Ryan Specialty only collect information such as identifying your browser and internet device and which pages you viewed on this portal. Unless explicitly provided by an individual, we will not collect any information that can personally identify you. This information is used to analyse usage in order to improve this portal.
- We use cookies to help this portal function properly, improve user experience, allow us to improve the portal and marketing and provide you with a more personalised experience when using our services.
- We use third party companies as suppliers for some of our functions. Their use of the data is controlled by our contract with them and they are only allowed to use the data strictly for the purpose we have stated e.g. the data is not used in connection with data from other companies and we are not tracking user behaviour outside our own sites.
- Cookies used on our portal may include:

First party cookies	Already set, and can only be read, by Ryan Specialty.
Third party cookies	Already set on our portal by third party suppliers in order to deliver the services that they are providing (e.g. web traffic analysis).

- Cookies on our portal may include:

a) Strictly necessary cookies
These are cookies that are necessary for the portal to function and cannot be switched off in our systems. We do not require your consent to set 'strictly necessary' cookies and these cookies will be set even if you do not give consent to any cookies.

b) Targeting cookies
With your consent, these cookies are set through our portal by our advertising partners to provide you with personalised and non-personalised advertising. They also may be used to build a profile of your interests and show you relevant adverts on other websites. They are based on uniquely identifying your browser and internet device.

c) Functional cookies
With your consent, these cookies enable the portal to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages. These cookies record your visit to our portal, the pages you have visited and the links you have followed. We will use this information to make our portal more relevant to your interests. We may also share this information with third

parties for this purpose.

d) Performance cookies
With your consent, these cookies allow us to count visits and traffic sources so we can measure and improve the performance of our portal. They help us to know which pages are the most and least popular and see how visitors move around the portal.

- This portal may use web analytics services which use cookies (small data files stored on your computer) to help Ryan Specialty analyse how users use the portal. These cookies are used to collect information about how visitors use our site. The cookies collect information in an anonymous form, including the number of visitors to the portal, where visitors have come to the site from and the pages they visited. By using this portal, you consent to the web analytics service provider processing your data for the purposes set out above.
- Your browser may be capable of being programmed to reject cookies, to warn you before downloading cookies, or to disable cookies and information regarding this may be found in your browser's 'help' facility. However, disabling or rejecting cookies may affect our websites functionality.

This cookies and privacy policy only covers this portal. Any other websites, such as social networking sites, which may be linked to by the Website may be subject to their own cookies and privacy policy, which may differ from ours and we are not responsible for the content provided on any third-party web sites. For more details about managing and switching of cookies, please see the All About Cookies website https://allaboutcookies.org/.

If you have any questions regarding the use of cookies, please contact us by emailing Legalinternational@ryansg.com.

9. Your right to complain

If you are dissatisfied about how we use or have used your personal data, you can contact us at Legalinternational@ryansg.com. If you believe that the Company has not complied with your data protection rights, you have the right to make a complaint to the data protection regulator in the country in which you are located.