



## Argo Human Resources Privacy Notice

**Effective Date: August 5, 2020**

### **SCOPE**

This Human Resources Privacy Notice (“HR Privacy Notice”) applies to personal information of applicants and employees (and independent contractors) that Argo collects and processes to conduct our Human Resources Operations, from submission of an application, throughout the course of an individual’s employment, and following employment (collectively, the “Human Resources Operations”).

The terms “Argo,” “we,” “us,” and “our” includes Argo Group International Holdings Ltd, Argo Management Services, Inc., and any of our affiliates and subsidiaries as applicable. This HR Privacy Notice explains the kinds of personal information we may collect, how we intend to use and share that personal information, and how you may be able to opt-out of a use or correct or change such personal information.

### **PERSONAL INFORMATION WE COLLECT**

Argo collects personal information from job applicants and current and former employees. The personal information we collect may include name, address, phone number, email address, date of birth, passport number, driver’s license number, Social Security number or other government-issued identification number, employment history, education, professional qualifications, salary information, financial information related to credit checks, bank details for payroll, information that may be recorded on a resume/CV or application form, language abilities, contact information of third parties in case of an emergency and beneficiaries under any insurance policy. We may also collect sensitive personal information such as details of health and disability, including medical information, drug testing results, health insurance information, mental health, medical leave, and maternity leave; information about national origin or immigration status; and optional demographic information such as race or veteran status, which helps us achieve our diversity goals.

Argo may also collect personal information from its applicants and employees as follows:

**Communications with Us.** We may collect personal information such as personal contact information when an applicant or employee communicates with us, for example to apply for a position or inquire about employee benefits.

**Posting on Intra-Argo Sites.** Argo may offer intra-company accessible sites, pages, messaging channels, blogs, or forums (“Intra-Argo Sites”). Argo and other individuals who use the Intra-Argo Sites may collect the information you submit or make available through these sites. If you choose to submit content to any public area of the Intra-Argo Sites, such content will be considered “public” and will not be subject to the privacy protections set forth in this HR Privacy Notice.



**Use of Argo Information Technology Systems and Networks.** Argo may collect certain information automatically through the course of your employment, such as your Internet protocol (IP) address, inferred location based on your IP address or activities, device identifiers associated with your computer or device, mobile carrier and related information, activity logs, and other information about activities you engage in on Argo property, equipment, accounts, systems and networks. Argo may monitor and review employees' uses of Argo equipment, accounts, information technology systems and networks, including its phone networks, computer networks, including those used to access the Internet, videoconferencing systems and other company-provided electronic communications tools. Argo may access and review electronic files, messages, and emails sent or stored on its information technology systems, including accounts, computers and devices provided to employees.

*Please note that you have no expectation of privacy while at Argo premises or using Argo information technology systems, networks, and electronic communication tools.*

**CCTV Footage.** Argo may monitor its premises using CCTV cameras.

**Surveys.** From time to time, we may ask you to participate in surveys. If you decide to participate, you may be asked to provide certain information which may include personal information. All information collected from your participation in our surveys is provided by you voluntarily. We may use such information consistent with this HR Privacy Notice.

**Contests.** Occasionally, Argo may run contests. We ask those who participate to provide information relevant to the contest.

**Information from Other Sources.** We may collect or receive information about you from other sources, including through third party services and organizations to supplement information provided by you. For example, where permitted by law, we may conduct background checks on you prior to your employment with Argo. This supplemental information allows us to verify information that you have provided to Argo.

**Miscellaneous Information.** We may receive or collect other miscellaneous information (for example, information you choose to disclose during the interview process, whether in verbal or written form, opinions generated during the interview process, and information provided to us during performance reviews).

## **HOW ARGO USES YOUR INFORMATION**

We process personal information for a variety of business purposes, depending on the nature of the personal information and the relationship we have with you.

**Performance of Contract** We may process personal information to perform our contractual obligations with you or in preparation for such contractual obligations.



**Legitimate Interests** We may use personal information in order to operate our organization and provide the services, other than in performing our contractual obligations to you, for our “legitimate interests” for the purposes of applicable law, except where our interests are overridden by the interests or fundamental rights and freedoms of the data subject.

**Compliance with Legal Obligations** We may process personal information in order to comply with our legal obligations. Comply with laws and legal obligations, law enforcement and regulatory requests, court orders, subpoenas, or pursuant to legal process.

**Protection of Individual’s Vital Interests** We may use personal information where we believe it is necessary to protect the vital interests of you or of another person.

**Consent** In some cases where we are not already authorized to process personal information under applicable law, we may ask for your consent to process your personal information.

Some of the specific business purposes that we may use your personal information for include:

- Benefit Administration
- Compensation Management
- Payroll Management
- Onboarding & New Hire Management
- Background checks
- Talent Acquisition & Staffing
- Workforce Management
- Organizational Design
- Performance Management
- Rewards & Recognition Management
- Learning Development
- HR Operations, such as operating HR technology and managing employee programs
- Talent Review & Succession Planning
- HR Operations, such as enforcing employee handbook and other internal policies, and compliance
- Employee & Labor Relations

## **HOW WE DISCLOSE YOUR INFORMATION**

We may share your information as described in this HR Privacy Notice (e.g., with our third-party service providers; to comply with legal obligations; to protect and defend our rights and property) or with your permission.



**We Use Vendors and Service Providers.** We may engage third parties to perform certain functions on our behalf. To do so, we may disclose personal information to our third-party vendors and service providers in order to conduct the above reference business purposes. We may also share personal information to service providers or other third parties to detect, protect against, and respond to security incidents or other malicious, deceptive, illegal or fraudulent activity or other threats and for legal compliance purposes or pursuant to legal process.

**Affiliates and Subsidiaries.** Argo may share personal information with our affiliates and subsidiaries for our and our affiliates' and subsidiaries' internal business purposes.

**Displaying to Other Individuals.** When you post content to the Intra-Argo Site(s), other individuals may be able to see some personal information about you, such as your name and/or picture in addition to the content you post. We are not responsible for practices of the individuals who view and use your personal information.

**Disclosures to Protect Us or Others.** We may access, preserve, and disclose your personal information if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) protect your, our or others' rights, property, or safety; (iii) to enforce Argo policies and contracts; (iv) to collect amounts owed to us; (v) when we believe disclosure is necessary or appropriate to prevent financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (vi) if we, in good faith, believe that disclosure is otherwise necessary or advisable.

**Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another entity, then your person information may be transferred as part of such a transaction as permitted by law and/or contract.

## **INTERNATIONAL DATA TRANSFERS**

All information collected via or by Argo may be transferred, processed, and stored anywhere in the world, including but not limited to, the United States, in order to carry out our Human Resources Operations.

## **YOUR CHOICES**

In some instances, you may have the right to opt out of and object to certain uses and disclosures of your personal information.

**Consent.** Where appropriate under applicable law, and where you have consented to Argo processing your personal information for a particular purpose, you may withdraw that consent at any time by contacting us as set forth below.

For more information on the choices you may have and how to exercise them, please contact us as set forth below.



## **INDIVIDUAL RIGHTS IN PERSONAL INFORMATION**

In accordance with applicable law, you may have the right to: (i) request confirmation of whether we are processing your personal information; (ii) obtain access to or a copy of your personal information; (iii) receive an electronic copy of personal information that you have provided to us, or ask us to send that information to another company (the “right of data portability”); (iv) restrict our uses of your personal information; (v) seek correction of inaccurate, untrue or incomplete personal information; and (vi) request erasure of personal information held about you by Argo, subject to certain exceptions prescribed by law. If you would like to exercise any of these rights, please contact us as set forth below.

We will process such requests in accordance with applicable laws. To protect your privacy, Argo will take steps to verify your identity before fulfilling your request.

## **DATA RETENTION**

Argo retains the personal information we receive as described in this HR Privacy Notice for as long as necessary to fulfill the purpose(s) for which it was collected, carry out our Human Resources Operations, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

We will retain any personal information collected from applicants who are not offered employment with Argo for up to 3 years for applicants based in the U.S., and up to 1 year for applicants based in the European Union or other jurisdictions outside of the U.S. If we require retention of this personal information for longer than these periods, will notify you to request an extension.

## **SECURITY OF YOUR INFORMATION**

We implement reasonable technical and organizational security measures designed to secure and protect personal information. Please note, however, we cannot fully eliminate security risks associated with the storage and transmission of Personal information.

## **THIRD PARTY WEBSITES/APPLICATIONS.**

Various resources and sites at Argo may contain links to third party websites/applications and other websites/applications may reference or link to Argo. These third-party services are not controlled by us. We encourage our applicants and employees to read the privacy policies of each website and application with which they interact. We do not endorse, screen or approve, and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.



## **SUPERVISORY AUTHORITY**

If you are an applicant or employee located in the European Economic Area, you have the right to lodge a complaint with the applicable supervisory authority if you believe our processing of your personal information violates applicable law.

## **CHANGES TO THIS HR PRIVACY NOTICE**

We may revise this HR Privacy Notice from time to time in our sole discretion. If there are any material changes to this HR Privacy Notice, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated HR Privacy Notice if you continue your employment with Argo after the new HR Privacy Notice takes effect. If at any point you do not agree to any portion of the HR Privacy Notice in effect, you must immediately contact Human Resources.

## **CONTACT US**

For more information or if you have questions or concerns about our privacy practices, please contact us by email at [privacy@argogroupus.com](mailto:privacy@argogroupus.com) or by mail or phone using the details provided below:

The Data Protection Officer  
Argo Group International Holdings Ltd.  
P.O. Box 469011  
San Antonio, Texas 78246  
1-800-470-7958

The Data Protection Officer  
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