

Data Protection Framework

2021

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1 INTRODUCTION

This document sets out the Argo Group Data Protection Framework (the “Framework”). The documents and guidance that make up the Data Protection Framework are co-managed by Argo Group’s Data Protection Officer and Chief Privacy Counsel, and available for review on the Argo Group intranet.

The Data Protection Framework applies to Argo Group International Holdings Ltd & Subsidiaries (the “Argo Group”). It outlines the composition and objectives of Argo Group’s Data Protection Program.

The Data Protection Program at Argo Group consists of efforts and program elements across three related but individual domains:

- Privacy
- Information Security
- Records & Information Management

The Argo Group’s Data Protection Framework is a composite of elements across these three individual domains. These include the Privacy Policy, Information Security Policy, and Records & Information Management Policy, as well as the applicable standards and procedures that support these policies.

Argo Group has adopted this Framework and implemented the applicable policies, standards, and procedures to protect Argo’s information and information systems, achieve our regulatory and compliance obligations, and enable the success of Argo Group’s global business operations.

2 RESPONSIBILITY AND OWNERSHIP

Argo Group Security Governance Council (SGC)

Approves this Framework. Delegates to the Argo Group Data Protection Officer and Chief Privacy & Cybersecurity Counsel, its responsibility for oversight and management of the Framework. Receives and reviews quarterly Data Protection reporting from the Data Protection Officer and Chief Privacy & Cybersecurity Counsel.

The Argo Group Data Protection Officer (DPO)

Reports into the Argo Group Security Governance Council on matters of Data Protection. The Data Protection Officer is responsible for the management and updating of this Framework, and all applicable documents and guidance. The Framework is owned by the Argo Group Enterprise Security.

The Argo Group Chief Privacy & Cybersecurity Counsel (CPCC)

Reports into the Argo Group Security Governance Council on matters related to Data Protection. Is responsible for providing the legal and regulatory guidance needed for the appropriate management and update of this Framework and the Data Protection Program.

Argo Group Employees, Officers & Directors

Employees, Officers and Directors (collectively “Employees”) are responsible for complying with the requirements of this Framework, and the applicable policies, standards and procedures.

3 FRAMEWORK ELEMENTS

Documentation

Privacy Policy



Argo Group has adopted the Privacy Policy to establish the control objectives for the Privacy Program

Information Security Policy

Argo Group has adopted the Information Security Policy to establish the control objectives for the Information Security Program.

Records & Information Management Policy

Argo Group has adopted the Records & Information Management Policy to establish the control objectives for the Records & Information Management Program.

Standards

Argo Group has implemented appropriate and applicable Standard to document the global requirements for the implementation of the Privacy, Information Security, and Records & Information Management Standards.

Procedures & Guidelines

Documents specific requirements at local level designed to help guide how the requirements of the applicable Standards are to be implemented or achieved.

Guidance & Training

Argo Group is committed to providing the necessary guidance and training to employees necessary to ensure they understand the Argo Group's approach to Data Protection.

Reporting Mechanisms

All employees are given the opportunity to report any concerns they may have regarding Argo's Data Protection Program through several different means ensuring there are no barriers to reporting.

External Reporting

Data Protection reporting will take place quarterly and will form a part of the reporting provided to the Argo Group Security Governance Council on a quarterly basis.

4 RELATED DOCUMENTS

- ✓ Argo Group Code of Conduct & Business Ethics
- ✓ Privacy Policy
- ✓ Information Security Policy
- ✓ Records & Information Management Policy