

ASPEN DIGITAL SOLUTIONS – PRIVACY POLICY

Effective Date: January 1, 2025

This Privacy Policy (“Policy”) explains how Aspen Digital Solutions, LLC (“Aspen,” “we,” “our,” or “us”) collects, uses, shares, and protects personal information when you interact with our:

Website: <https://aspndgtl.com/>

Platform: our cloud software-as-a-service solution for commercial-insurance professionals (including portals, mobile/desktop apps, and related APIs)

Other Services: any products, services, events, or marketing materials that link to or reference this Policy

Registered Address: 4860 Cox Road, Suite 200, Glen Allen, VA 23060 USA

We may update this Policy from time to time. If changes are material, we will notify Customers and registered Users via e-mail or in-product notice before they take effect. Continued use of our Services after an update constitutes acceptance of the revised Policy.

1. WHO WE ARE

Aspen Digital Solutions, LLC is a U.S. SaaS provider serving commercial-insurance carriers, brokers, MGAs, and related professionals with a cloud platform that automates underwriting, policy administration, and claims workflows.

2. ROLES & DEFINITIONS

Visitor – anyone browsing the Website without logging in

Customer – the legal entity that contracts with Aspen for Services

User – an individual (e.g., employee, agent, broker) authorized or invited by a customer, contractor, or employee to access Aspen’s website or software platforms.

3. INFORMATION WE COLLECT

3.1 Visitor Data

IP address, approximate location, time-zone

Device/browser details (model, OS, language, screen size)

Referring URLs, pages viewed, time spent, clicks, scrolls

Cookies, pixels, and similar tracking technologies

Data entered in web forms (name, email, phone, company, message)

3.2 Customer Data

Legal entity name, postal address, tax/VAT ID

Authorized representative's name, title, phone, email

Billing contact, PO references

Contract preferences, license counts, audit logs, support tickets

3.3 User Data

Name, business email, phone, role, authentication credentials

Usage metadata (features accessed, clicks, searches, settings)

Device info (type, OS, browser, IP, time-zone)

Diagnostic logs, error reports, screen recordings submitted for support

Cookies, SDK identifiers, telemetry generated by the Platform

We do not intentionally collect “special categories of personal data” (GDPR Art. 9) such as health, biometrics, race, or sexual orientation, nor do we target children under 16.

4. HOW & WHY WE USE PERSONAL INFORMATION

Provide, configure, and maintain the Platform and related Services

Authenticate login and secure accounts

Process payments, invoices, and renewals

Detect, investigate, and prevent fraud or security incidents

Monitor performance, analyze trends, and improve features and UX

Send transactional notices (password resets, service alerts, release notes)

Respond to enquiries, tickets, and feedback

Market Aspen products or events (with opt-out)

Comply with legal obligations and enforce contracts

When data is anonymized and aggregated, it is no longer personal and Aspen may use it for benchmarking, analytics, or research without further notice.

5. USE OF ARTIFICIAL INTELLIGENCE

Aspen employs machine-learning models for document classification, risk scoring, loss-run summarization, and quote recommendations.

Models are trained only on data subsets required for each purpose.

Customer data is never sold, shared externally, or used to train public models.

Outputs are reviewed and tested to minimize bias.

All ML processing follows security and privacy controls in Section 10.

6. LEGAL BASES FOR PROCESSING (GDPR)

Contract performance – to deliver Platform services

Legitimate interests – security, fraud prevention, product improvement, B2B marketing

Consent – non-essential cookies, newsletters, webinars

Legal obligation – tax, accounting, regulatory requirements

7. YOUR PRIVACY RIGHTS

Depending on jurisdiction, you may have rights to be informed, access, rectify, erase, restrict, object, port data, or opt out of automated decision-making.

California residents (CCPA/CPRA): know, delete, correct, or opt out of “sale” or “sharing” (Aspen does not sell personal information) and no discrimination for exercising rights.

India residents (SPDI): give/withdraw consent, access, correct sensitive personal data

Submit your requests to us using the “Contact Us” button on the website. We will verify identity and respond within legally required timeframes.

8. COOKIES & TRACKING

We use first- and third-party cookies, pixels, and local storage to:

Remember preferences and sessions

Measure Website traffic and campaign effectiveness

Improve content and navigation

9. PAYMENT INFORMATION

Payments are processed by PCI-DSS-certified providers. Aspen never stores full card numbers. Processors may use payment data only to complete transactions or comply with the law.

10. SECURITY MEASURES

Aspen maintains an ISO/IEC 27001:2022-aligned Information Security Management System (ISMS) that includes:

AES-256 encryption at rest and TLS 1.2+ in transit

Role-based access control (RBAC) and multi-factor authentication (MFA)

Least-privilege administration with quarterly access reviews

Continuous vulnerability scanning, monthly patching, annual penetration tests

24×7 intrusion detection, logging, and incident-response playbooks

Encrypted backups and disaster-recovery replication in a separate region

Vendor risk management and Data Processing Agreements with sub-processors

11. DATA RETENTION

Personal information is retained:

For the duration of the Customer agreement plus any renewal period

As long as necessary for Services and legitimate business operations

As required to satisfy legal, tax, or audit obligations

Upon termination, Customer and User data are deleted or irreversibly anonymized within 90 days unless legally required otherwise.

12. CUSTOMER INTEGRATIONS & THIRD-PARTY TOOLS

Customers integrating third-party systems (rating engines, CRMs, BI tools, cloud storage, etc.) are responsible for obtaining the required consent and ensuring compliance with applicable privacy laws.

13. INTERNATIONAL DATA TRANSFERS

Aspen's cloud infrastructure may reside in the U.S. or other countries. Transfers from the EEA/UK/Switzerland to non-adequate jurisdictions are protected by Standard Contractual Clauses (SCCs) or comparable safeguards.

14. COMPULSORY DISCLOSURES

We may disclose personal data to:

Comply with subpoenas, court orders, or legal processes

Protect rights, property, or safety, or investigate fraud/security breaches

Complete a merger, acquisition, or sale of assets (subject to confidentiality)

15. CHILDREN

Our Services are not directed to children under 16, and we do not knowingly collect their data. Contact us if you believe data was collected inadvertently.

16. CHANGES TO THIS POLICY

Material changes will be announced via e-mail to account for administrators or prominent platform notice at least 15 days before becoming effective (unless immediate change is required by law).

17. CONTACT / GRIEVANCE OFFICER

Data Protection & Privacy Office

Aspen Digital Solutions, LLC

4860 Cox Road, Suite 200

Glen Allen, VA 23060 USA

By accessing or using Aspen's Website, Platform, or Services, you acknowledge that you have read and understood this Policy and agree to Aspen's collection, use, and disclosure of your information as described above.