

# Who controls the technology behind a UK insurer or broker?

How much this sector depends on technology suppliers it cannot fully control — and where that matters most.

June 2026

## The big picture

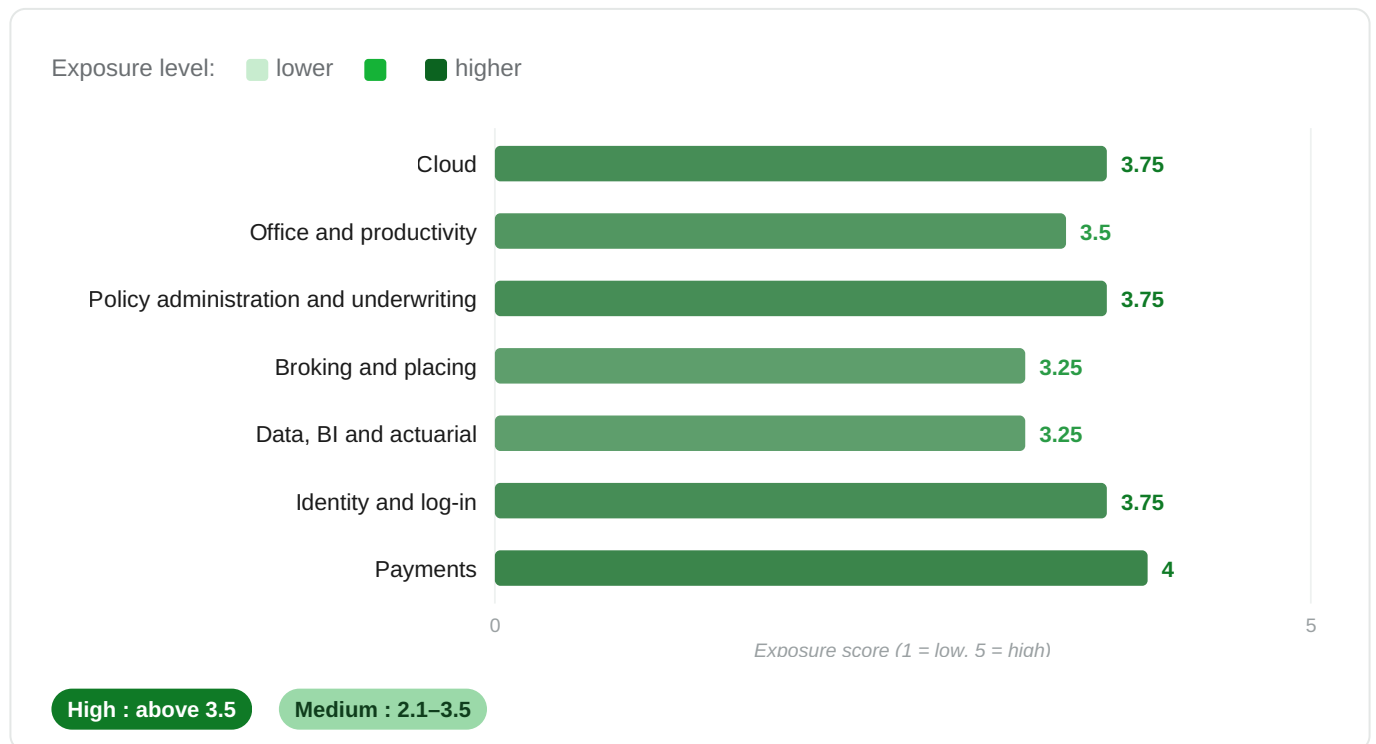
### HIGH EXPOSURE

3.6 / 5

For a typical UK insurer, managing general agent (MGA) or broker, all seven technology building blocks come out as High exposure, with a overall headline score of 3.6. The defining risk is sector-specific: the policy administration system (PAS) and underwriting engine - the software an insurer actually trades on - is dominated by US-controlled suppliers (Guidewire, Duck Creek, Applied Systems), and it holds the most sensitive data on the profile: customers' financial and, for life and health lines, medical records. The one genuine bright spot is the broking and placing layer, where UK and European-controlled options exist and one major supplier, Acturis, runs its own data centres rather than renting a US cloud.

We looked at the everyday layers of technology a UK insurer or broker relies on, from the cloud it runs on to the systems that define the sector. A supplier owned in the United States can be compelled to hand over data under US law — the CLOUD Act<sup>[1]</sup>, and the surveillance powers in Section 702 of the Foreign Intelligence Surveillance Act<sup>[2]</sup> — even when that data is stored in Britain; a British supplier answers only to UK law. We scored each building block on four things — how few the suppliers are, whose laws they answer to, how hard they are to switch, and how essential they are.

## Where the exposure sits



## Who controls each layer

The building blocks this sector relies on, coloured by who ultimately controls each one: ■ US-controlled ■ Mixed / other

|   |       |
|---|-------|
| <b>Cloud</b><br>Microsoft Azure / Amazon Web Services   | US    |
| <b>Office and productivity</b><br>Microsoft 365   | US    |
| <b>Policy administration and underwriting</b><br>Guidewire / Duck Creek / Applied Systems / Sapiens / SSP | US    |
| <b>Broking and placing</b><br>Acturis / Open GI / PPL (Lloyd's)   | Mixed |
| <b>Data, BI and actuarial</b><br>Verisk / Earnix / hyperexponential / Microsoft Power BI                  | US    |
| <b>Identity and log-in</b><br>Microsoft Entra   | US    |
| <b>Payments</b><br>Visa / Mastercard + UK bank rails  | US    |

None of the seven layers is wholly UK-controlled in a sector-typical stack, but the broking and placing layer is the bright spot: PPL (Placing Platform Limited) is UK-controlled, and Acturis - though French-owned - runs its own UK and Amsterdam data centres rather than a US cloud, making it a rare UK-hosted, own-infrastructure option against the 84% foreign-control floor we see across UK software. The core platform and data layers also carry credible UK-controlled smaller names (INSTANDA, Send Technology, Total Systems, CDL, hyperexponential).

## What this means, in plain terms

**The trading platform itself is US-controlled and holds the most sensitive data.** An insurer or MGA (managing general agent - a firm that underwrites on an insurer's behalf) trades on its policy administration system (PAS - the system that holds policies, premiums and claims) and underwriting engine. The big general-insurance platforms are US-controlled (Guidewire, Duck Creek, Applied Systems), with Sapiens (Israel) and SSP (Canada) as the main non-US names. This is the highest-sensitivity layer on the profile: it holds customers' financial details and, for life and health insurance, their medical history - exactly the data the US CLOUD Act<sup>[1]</sup> (the Clarifying Lawful Overseas Use of Data Act 2018, which lets US authorities compel a US company to hand over data it controls wherever it is stored) is about<sup>[3]</sup>.

**Acturis is a rare bright spot - it runs its own data centres.** Most of the stack ultimately rents space on a US hyperscaler (Azure or AWS), which means even non-US software inherits a US substrate. Acturis is the exception: it runs its own data centres in London and Amsterdam rather than on a US cloud. That removes the hidden US-substrate layer beneath it. The catch is ownership: Acturis is majority-owned (about 52%) by Astorg, a French private-equity firm, so its controlling jurisdiction is France (European, not UK) - better than US legal reach, but not British control<sup>[3]</sup>.

**The broking and placing layer is where UK and European choice actually exists.** Unlike cloud or office software, the broker and placing layer has real alternatives. PPL (Placing Platform Limited), the Lloyd's market's electronic placing platform, is UK-controlled. Acturis is French-controlled but UK-hosted on its own infrastructure. The main US name here is Open GI, which Ares Management (US) bought from Montagu in late 2024 - a recent change of control that moved its jurisdiction the wrong way. So the placing layer is the one place a UK firm can meaningfully lower its jurisdictional exposure by choosing carefully.

**Microsoft sits under a large share of the stack.** Microsoft controls the cloud (Azure), the office software (Microsoft 365) and the staff log-in (Microsoft Entra) directly - and several insurance platforms run on Azure underneath (Duck Creek and Sapiens both host on Azure; Guidewire and hyperexponential run on Amazon). The variety of insurance-software brands hides the fact that most of it ultimately sits on one of two American clouds, so a single problem at one cloud provider would hit several layers at once.

**Foreign legal reach, not data location, is the real issue.** Keeping data in a UK region does not remove US legal reach: the test is who controls the supplier, not where the data sits. Six of the seven layers are controlled from the United States, and the two largest non-US options on the core platform are Israel (Sapiens, Earnix) and Canada (SSP) - better than the US on the jurisdiction ladder, but still foreign. For an insurer holding customers' financial and health data, that combination - sensitive data under foreign legal reach - is the heart of the problem.

## If a supplier pulled the plug, how fast would it hurt?

| SPEED OF IMPACT  | LAYER                                  | WHAT HAPPENS   |
|------------------|--|--|
| <b>Immediate</b> | Identity and log-in (Microsoft Entra)  | Staff log-in fails within hours - an instant lockout of every cloud system at once; nothing else can be used while it is down. |
| <b>Immediate</b> | Payments                               | Premium collection and claims payouts fail within hours; the card schemes have effectively no substitute.                      |
| <b>Fast</b>      | Policy administration and underwriting | The firm cannot write or service policies within days; replacing a PAS is a multi-year programme compressed into a crisis.     |
| <b>Fast</b>      | Cloud                                  | Account suspension propagates quickly to everything hosted on it; six-to-twelve months to re-platform.                         |
| <b>Medium</b>    | Broking and placing                    | New business and renewals stall; brokers can fall back on manual placing for a short while, but it does not scale.             |
| <b>Medium</b>    | Data, BI and actuarial                 | Pricing and reporting degrade; actuarial and rating work can limp on local copies for a while.                                 |
| <b>Slow</b>      | Office and productivity                | Email and documents limp offline; painful but survivable.  |

## What organisations can do about this

| BUILDING BLOCK | PRACTICAL STEPS |
|----------------|-----------------|
|----------------|-----------------|

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**Policy administration and underwriting - the core decision**

PAS contracts run for years, so renewal is the decision point. The widely-used platforms - Guidewire, Duck Creek, Applied Systems - are all US-controlled. The main non-US options in our database are Sapiens (Israel) and SSP (Canada), both better than the US on the jurisdiction ladder but still foreign; INSTANDA, Send Technology and Total Systems are UK-controlled names worth checking for the lines they cover. Always keep an exportable copy of the policy and claims data so you are never trapped in one vendor's system.

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**Broking and placing - take the UK/European option where it exists**

This is the one layer where a UK firm can genuinely lower jurisdictional exposure. PPL (Placing Platform Limited) is UK-controlled and central to the Lloyd's market. Acturis is French-controlled but runs its own UK and Amsterdam data centres rather than a US cloud, which removes the hidden US substrate. CDL, Transactor and Total Systems are further UK-controlled names in our database. Prefer these over Open GI, now US-owned after the Ares acquisition.

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## Cloud and log-in - reduce the Microsoft concentration

Moving the cloud and/or staff log-in off Microsoft stops one problem taking down email, log-in and hosting together. UK and European cloud options: OVHcloud and Scaleway (France), IONOS (Germany), Civo (UK). Identity is the hardest block to move, so scope it early; the open-source log-in system Keycloak, self-hosted, is one way to reduce reliance on a single US provider.

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## Data, BI and actuarial - localise and keep open formats

Keep rating and actuarial data in a UK or European region, hold your own encryption keys, and favour open formats so the data is not trapped. hyperexponential is a UK-controlled pricing and actuarial platform (though it hosts on Amazon, inheriting a US substrate - check the residency and key arrangements).

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## Payments - accept and monitor

Largely accept and monitor, but use domestic UK rails (Faster Payments and Bacs, run by Pay.UK) for premium and claims money movement wherever the use-case allows, rather than the international card schemes.

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## Sources

1. US CLOUD Act 2018 (18 U.S.C. 2713) - compels US-incorporated providers to produce data in their custody wherever in the world it is stored. <https://www.govinfo.gov/content/pkg/USCODE-2018-title18/html/USCODE-2018-title18-partI-chap121-sec2713.htm>
2. US Foreign Intelligence Surveillance Act, Section 702 (50 U.S.C. 1881a) - a US directed-surveillance authority. <https://www.govinfo.gov/app/details/USCODE-2021-title50/USCODE-2021-title50-chap36-subchapVI-sec1881a>
3. Vendor ownership and hosting - taken from company filings, public registries (including UK Companies House) and suppliers' own documentation, compiled in the Information Matters UK vendor sovereignty database.

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**How we did this.** We scored each technology layer on four things — supplier concentration, whose laws they answer to, how hard they are to switch, and how essential they are — using the IM Sovereignty Framework and our UK vendor database. Control and hosting facts come from

primary sources; the harder-to-quantify judgments are our reasoned view of a typical organisation. Scores are bands, not exact measurements. Full evidence record available on request.

This research consists of the opinions of the Information Matters team — human and AI — and should not be considered statements of fact.

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