

## GENERAL PRIVACY POLICY

### 1.0 Introduction

1.1 Sompo International<sup>1</sup> is committed to protecting your privacy and respecting the privacy rights and data protection rights you have under applicable law and regulations. This privacy policy ("Policy") describes the personal information Sompo International ("we" or "us" or "Sompo") collects and how we use that personal information. This Policy also describes your data protection rights.<sup>2</sup>

1.2 As used in this Policy, personal information includes data and information we are required to protect in accordance with applicable laws and regulations. This information may be about individuals or entities, including information we collect about insurance applicants, policyholders, beneficiaries, third party claimants, visitors to our website at [www.sompo-intl.com](http://www.sompo-intl.com) (the "Site") and information collected through the use of cookies and related technologies on our Site.

1.3 Personal information also includes information our third-party business partners and vendors collect and provide to us.

1.4 We may collect this information in many ways, including from information or documents submitted to us electronically or otherwise, information submitted through our Site, during online or telephone conversations, and at in-person meetings.

1.5 We also may collect personal information from other sources, including information that may have been originally collected from other Sompo affiliates, business partners or third party vendors. We also may combine information from other sources with information you may provide us.

1.6 In addition to this Policy, we may provide additional information about our privacy practices at other times at which you may provide information, including when you are applying for a product or service from us or making a claim.

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<sup>1</sup> The term "Sompo International" refers to and includes all subsidiaries of Sompo International Holdings Ltd., a Bermuda exempted company ("SIH"). To the extent, however, that an affiliate of SIH that is not a subsidiary of SIH receives or uses data that is covered by this General Privacy Policy and requires protection under applicable law or regulation, then such affiliate is included within "Sompo International" for purposes of protecting the data that such affiliate receives or uses.

<sup>2</sup> More information about your rights, and how to exercise them, is set out in the Your Choices and Rights section.

## 2.0 The Personal Information We Collect

**2.1 Policyholders:** When you or a third party on your behalf applies for an insurance contract or other service, we may collect your name, contact information and other personal information about you and other relevant persons or entities that is necessary or appropriate for us to consider and review. We use this information as part of our decision making process, including whether or not to issue a reinsurance or insurance contract or provide related services to you.

**2.2 Vendors and Business Partners:** We will process for our business certain information about individuals and entities within organisations with whom we work, including brokers, producers, agents, underwriters, loss adjusters, claims agents, third party administrators, marketing and advertising firms, information technology companies, attorneys, consultants, advisors and other service providers that provide a wide range of services to our businesses.

**2.3 Website Visitors:** When visiting our Site or submitting questions or requests to us through the Site or regular email, we collect your name and contact details and other information you submit in order to respond to your communication.

**2.4 Other Information:** We may also monitor or record telephone calls, emails, SMS messages or other communications, CCTV recordings, mobile phone tracking information, embedded chips and other information that we may acquire through any other means, technology or technique in the conduct of our business.

## 3.0 Use of your Personal Information and the Legal Basis for Processing and Using It

**3.1** We may use your personal information in many different ways when you seek to purchase a product or service, or benefit from our product or service. We and our business partners and vendors may use your information in various aspects of our operations and businesses, including:

- (i) verifying your identity;
- (ii) identifying and assessing risk or underwriting or issuing a product or service, including an insurance contract;
- (iii) accepting payments;
- (iv) communicating with you or appropriate third parties and making arrangements for providing products or services to you;
- (v) administering insurance, credit and related services or other products for you or others that may benefit from such services;
- (vi) managing claims and claims related activities associated with an insurance contract and making decisions about such claims matters, including recovery from, or cost or loss sharing allocation with, other insurers or reinsurers;

- (vii) identifying debtors or beneficiaries and recovering debt;
- (viii) preventing, investigating or reporting potential fraud, money laundering, terrorism, misrepresentation, or security incidents or sanctions violations or any crimes in accordance with applicable law or regulations;
- (ix) developing, improving or protecting our products, services, the Site, and systems, otherwise managing or auditing your accounts or insurance policies or other products or services and the platforms and distribution channels that we use to provide them to you;
- (x) managing, reporting and auditing our business operations;
- (xi) researching, developing and applying risk management and statistical analyses;
- (xii) establishing, exercising or defending legal claims;
- (xiii) meeting regulatory and compliance requirements; and
- (xiv) responding to requests by governmental agencies or law enforcement authorities conducting an investigation or for reporting required in connection with our businesses or in accordance with all applicable laws and regulations, including sanctions requirements.

**3.2** As an organization in the business of insurance and reinsurance, we may be required to use the information we collect about you in accordance with the authority and responsibility that government authorities characterize as has having a substantial public interest. To the extent, therefore, that a government authority considers the use or processing of any data or information that we collect as necessary for the tasks we perform in accordance with the authority given to us by a governmental authority, then, accordingly, we will collect and use the data for such purposes. Any such use, therefore, will override any data protection or privacy right you may have under applicable laws and regulations.

#### **4.1 How We Share Your Information**

- 4.1** For the purposes described in this Policy, we may share your information with:
- (i) Sompo affiliates;
  - (ii) brokers, producers, insurance agents, other insurers, reinsurers and underwriters, and financial institutions or entities with which we may do business;
  - (iii) government authorities and law enforcement agencies;
  - (iv) government agencies and industry associates engaged in fraud prevention, anti-terrorism, anti-money laundering or sanctions activities;
  - (v) parties that may have, or are interested in acquiring, a financial interest in the insurance or reinsurance policy or other contract used in our businesses;

- (vi) other business partners, vendors or service providers that process information about you on our behalf, including information technology service providers that host or support our business and that may have data about you and our businesses;
- (vii) otherwise with your consent;
- (viii) in accordance with applicable laws and regulations;
- (ix) in connection with a corporate or portfolio transaction, including a potential or actual sale, reorganisation, or divestiture of a company, or the sale of any combination of our assets, products, services, or businesses; or
- (x) in the course of a bankruptcy, dissolution or similar transactions or proceedings.

**4.2** If we share your personal information, we agree that we shall have appropriate non-disclosure and data security obligations in place to the extent required by applicable law and regulations.

## **5.0 Where You Give Us Consent**

**5.1** You will be requested to give us consent to use your information:

- (i) to use your contact details (including email address) for the purpose of sending you information about our products and services or other products and services provided by a Sompo company;
- (ii) to place cookies (as described below); or
- (iii) for other specific purposes in which we may request or use the information for the purpose that is explained at that time.

**5.2** If we rely on consent to use your information in accordance with applicable law and regulations, you may withdraw your consent at any time by using the Contact details described below.

## **6.0 Fraud Prevention, Anti-Terrorism and Anti-Money Laundering and Sanctions Compliance**

**6.1** To prevent and detect potential fraud, terrorism activities or improper or illegal money laundering or other illegal activities and to comply with applicable sanctions laws and regulations, we may at any time, in accordance with applicable laws and regulations, share your information with other organizations, industry databases and public bodies, including law enforcement and national security authorities in other countries and around the globe, for the following purposes:

- (i) to confirm, verify or share details about underwriting information or claims information about illness or injury;
- (ii) if we believe we may have been given incorrect, false or inaccurate information that may confirm potential or actual fraud or other illegal activity (we will also note this in the appropriate record or file we keep);

- (iii) to prevent fraud and money laundering and to comply with sanctions laws and regulations; or
- (iv) to comply with an applicable law or regulation or the order or requirements of a governmental or legal authority or agency that has jurisdiction over us.

**6.2** Law enforcement and other governmental agencies may access and use the information you provide to us for law enforcement and other governmental purposes. We and other insurance and governmental agencies may also access and use information you provide without additional consent from you.

**6.3** For additional information concerning how governmental agencies may use your information, please direct your inquiry to your local governmental agency that has jurisdiction over insurance or financial institutions, data privacy or other such matters.

## **7.0 International and Global Transfers**

**7.1** The global nature of our business and the services we provide require us to transfer your personal information around the globe, including within and outside the European Economic Area, the United Kingdom, the United States of America, Bermuda, Switzerland, Japan, and Singapore. Any of these jurisdictions may have different data protection standards from the ones that apply in your country of residence. When transferring such information, however, we comply with the applicable laws and regulations concerning the required protection of such information.

**7.2** Such transfers around the globe may be necessary to conclude or perform the insurance contract or other services or products we provide or may be necessary to establish, exercise or defend legal claims.

**7.3** If we use third parties, business partners or vendors to transfer or use such information around the globe, we require such parties to have in place required contractual provisions and data protection standards to protect your personal information as required by applicable law and regulations. A copy of these clauses is available for your review on our website at [www.sompo-intl.com](http://www.sompo-intl.com) or upon request sent to us using the Contact details provided below.

## **8.0 Access and other Rights**

**8.1** You may be entitled to ask us for a copy of your personal information, to correct it, erase it or restrict its processing, or to ask us to transfer some of this information to other organisations. You may also have rights to object to some processing and, where we have asked for your consent to process your data, to withdraw this consent. For instance, you may opt out of receiving marketing communications from us at any time by using the Contact details below. These

rights may be limited in some situations. For example, where we can demonstrate that we have a legal requirement to process your data. In some instances, this may mean that we are able to retain data even if you withdraw your consent. If you wish to exercise any of your rights, please use the Contact details below.

**8.2** If we require personal information or data to comply with applicable legal or contractual obligations, then you must provide such data. If such data is not provided, then we will not be able to consider your application for our products or services or manage your claim or satisfy obligations placed on us. In all other cases in which data or information is not required by us to perform our obligations or provide the requested service, then providing the requested personal information or data is optional.

**8.3** If you have additional questions or concerns, you also have the right to submit your concern, question or complaint to the data protection authority in the country or jurisdiction where you live or work or the place of the alleged infringement or violation.

## **9.0 Security and Retention**

**9.1** We use appropriate, feasible information security measures and technology where necessary to protect your personal information, including, but not limited to, firewalls and encryption.

**9.2** We will keep your personal information for as long as necessary to fulfil the business purposes for which we need it or to comply with applicable law and regulations. For more information on our specific retention policies please inquire utilizing the Contact details below.

## **10.0 Cookies and other Technologies**

**10.1** When you use our Site, we automatically collect technical information, including your device's IP address, browser type and version, time zone setting, browser plug-in types and versions, operating system, unique device identifiers and advertising identifiers. We also collect information about your visit, including the URL clickstream to, through and from our Site, pages that you view or interact with, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page. Some of this information is collected using cookies and related technologies. Cookies are small text files that websites send to your computer, mobile device or other Internet-connected device to uniquely identify your browser or to store information or settings in your browser. We use cookies on our Site which are essential for your use of the Site and its features (for example, to navigate to different pages of the website). We must use these cookies to make the website work as it should, whether or not you agree to such cookies being used.

**10.2** We use cookies to estimate the number of users accessing the Site and usage patterns, to recognise when you return to our site and to store information about your preferences so that we can provide you with a better service when you use our Site.

**10.3** You may change your browser settings so that you are notified when a cookie is being sent or to remove or reject cookies. Each browser is different, so look at your browser "Help" menu to learn the correct way to modify your cookie settings or to identify how to delete the cookies we have set on your device. However, if you choose to reject our cookie, you may be unable to access specific parts of our Site. To learn more about cookies and how to adjust your browser settings to control cookies, please visit: <http://www.allaboutcookies.org/>.

## **11. Links to Other Websites; Use by Children**

**11.1** From time to time our Site may contain links to third party websites. If you follow links to these websites, please note that these websites have their own privacy policies over which we have no control.

**11.2** Sompo does not knowingly collect personally identifying information from children under the age of 18. In the event that we learn that we have collected such information from a child under 18, the information will be deleted from our database as soon as reasonably possible.

## **12. Changes to this Policy**

Sompo may, from time to time, determine that changes in this Policy are prudent. If any such change is made, it will be posted on our Site. The applicable version of this Policy that will apply to Sompo's use or processing of information will be the version of this Policy in effect at the time the information is actually used or processed.

## **13. Your California Privacy Rights**

California Civil Code Section 1798.83 (also known as the "Shine The Light" law) permits users who are California residents to request and obtain from us once a year, free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of personal information that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please email your request to [legal@sompo-intl.com](mailto:legal@sompo-intl.com) or write us at the address above.

#### 14. Contact Us

Sompo is authorized by various governmental agencies and authorities to conduct and operate its businesses in different jurisdictions. If you have any questions regarding this Policy or our data collection practices or you wish to exercise any of your rights under applicable data protection laws, please contact us at:

Attn: Chief Compliance Officer  
Sompo International  
4 Manhattanville Rd.  
Purchase, NY 10577  
Email: [Privacy@Sompo-intl.com](mailto:Privacy@Sompo-intl.com)