

## PRIVACY POLICY

**We are committed to protecting your privacy. This privacy policy ("Policy") explains what personal information Sampo Japan Nipponkoa Insurance Company of Europe Limited ("Sampo", "we", "us") collects from and about you, how we use that personal information and your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the Access and other Rights section.**

**Please take time to read the following as it contains important information relating to the details you have given or should give to us. If you provide us with information about someone else, please ensure that you have obtained their permission to do so to enable us to process their personal information as described in this Policy.**

This Policy covers personal information we collect about: policyholders, third party claimants, visitors to our website at [www.sjnk.eu](http://www.sjnk.eu) (the "Site") and our business partners. We collect this information during our meetings and/or telephone conversations with you and through the completion of proposal forms, fact finds or interaction with our Site.

Please note that we combine personal information that we collect via one source with information collected from another source. As part of this, we combine personal information that has been originally collected by different Sampo group companies.

This Policy also explains how we collect information through the use of cookies and related technologies which are relevant if you visit our Site.

We may also provide additional information about our privacy practices at other points, for example where you are making a claim in person or via a solicitor and where such information will allow us to provide more relevant and timely information.

### **Personal Information Collected**

**Policyholders:** As part of an application for an insurance contract, we collect your name and contact information as well as information about other relevant individuals in connection with the insurance contract and the organisation represented.

**Partners:** We process certain contact information about individuals within organisations that we work with such as brokers, underwriters, loss adjusters, claims agents as well as IT and other service providers for contract management, accounting and marketing purposes.

**Website Visitors:** When submitting questions or requests to us via the Site, we collect your name and contact details in order to respond to the communication.

**Use of your Personal Information and our legal basis for processing:** We use your personal information:

- **to fulfil a contract, or take steps linked to a contract: this is relevant where you purchase our insurance products.** This includes: (i) taking payments; and (ii) communicating with you and arranging the provision of the products or services;
- **to the extent necessary to conduct our insurance business and pursue our legitimate interests (where these interests are not overridden by your data protection rights) in particular to:** (i) verify your identity (ii) assess risk and provide insurance products and services (iii) administer your insurance contract; (iv) communicate with you; (v) prevent,

investigate and/or report fraud, money laundering, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law; (vi) assess, establish and manage claims and make any appropriate settlements; (vii) manage, report and audit our business operations; (viii) recover debt; (ix) develop, improve and protect our products, services, Site, systems and relationships with you; (x) carry out research and statistical analysis; and (xi) establish, exercise or defend legal claims or to meet regulatory and compliance requirements;

- **for purposes which are required by law:** In response to requests by government or law enforcement authorities conducting an investigation;
- **to establish, exercise or defend legal claims;**
- **where processing is necessary for reasons of substantial public interest, on the basis of UK law:** To process sensitive personal data or criminal records data as part of a claim for insurance purposes or to process sensitive personal data or criminal record information for fraud prevention purposes, terrorist financing or money laundering or to prevent or detect any unlawful acts; and
- **where you give us consent:** (i) to occasionally use your contact details (including email address) to send you information about our products and services or other products and services provided by our group companies which we think you will be interested in; (ii) to place cookies as set out below; or (iii) on other specific occasions where we will use the data for the purpose which we explain at that time. Where we rely on consent, you may withdraw your consent at any time by using the contact details in the 'Contact Us' section below.

**Disclosures:** For the above purposes (as applicable), your personal information is shared with: (i) our group companies; (ii) brokers, other insurers and underwriters; (iii) government authorities and law enforcement agencies; (iv) fraud prevention agencies (for more detail, see below); (v) parties who have a financial interest in the insurance policy; and (vi) other trusted service providers who process your personal information on our behalf (e.g. IT service providers which host or support your personal information), to the extent required for the purposes outlined above; or otherwise with your consent or in accordance with applicable laws.

Your personal information may also be transferred in a corporate sale, reorganisation, or divestiture of the company, or any combination of our products, services, or assets. We may also transfer or assign such personal information in the course of a bankruptcy, dissolution or similar transactions or proceedings.

If we do share your personal information, we shall ensure that we have appropriate non-disclosure and data security obligations in place to protect your personal information.

### **Fraud Prevention and Anti-Money Laundering**

To prevent and detect fraud, we can at any time in accordance with applicable data protection laws: (i) share information with other organisations and public bodies including the police; (ii) check and/or file details (including details of any illness or injury) with fraud prevention agencies and insurance industry databases and if we are given false or inaccurate information and we identify fraud, we will record this. We and other organisations may also use and search these agencies and databases from the UK and other countries to:

- help make decisions about the provision and administration of insurance, credit and related services for you and members of your household;
- trace debtors or beneficiaries, recover debt, prevent fraud, and to manage your accounts or insurance policies; and
- check your identity to prevent money laundering, unless you provide us with other satisfactory proof of identity.

Law enforcement agencies can access and use the information given to fraud prevention agencies and insurance industry databases for law enforcement purposes.

We and other organisations also access and use this information to prevent fraud and money laundering, for example when:

- checking applications for, and managing credit and other facilities and recovering debt;
- checking insurance proposals and claims; and
- checking details of job applicants and employees.

We, and other organisations that access and use information recorded by fraud prevention agencies, can do so from other countries. We can provide the names and addresses of the agencies we use if you would like a copy of your information held by them or more information about how they use your information. Please use the 'Contact Us' details below quoting your reference.

**Financial Sanctions:** We will use information about you and that of others named on policy to ensure compliance with financial sanctions in effect in the UK and internationally. This will include the checking of your information against the HM Treasury list of financial sanctions targets as well as other publicly available sanctions lists. Your information and that of others named on the policy may be shared with HM Treasury and other international regulators to the extent permitted or required by law. You may also be contacted in order to provide further details in order to ensure compliance with Financial Sanctions requirements.

**Employers' Liability Tracing Office (ELTO):** We are also required to supply Employers' Liability insurance policy details to the Employers' Liability Tracing Office (ELTO) (name of employer and policy reference number only). These details will be added onto the Employers' Liability Database (ELD), which will be managed by ELTO. This database will be accessible by any claimants, and will assist claimants who have suffered an employment related injury or disease arising out of their course of employment in the UK, to find the insurer that was providing Employers' Liability cover during their relevant period of employment and also to find the relevant Employers' Liability insurance policies.

**Monitoring and Recording:** We may also monitor or record calls, emails, SMS messages or other communications in accordance with UK law for quality, security and training purposes.

**International Transfers:** Due to the global nature of our business and the services we provide, your personal information is transferred outside of the European Economic Area (including to the US, Bermuda, Switzerland, Japan, Hong Kong and Singapore) which may have different data protection standards to those which apply to your country of residence. We ensure that we comply with the applicable legal requirements when transferring your personal information outside of the EEA to ensure adequate protections are in place. Such transfers may be necessary to conclude or perform the insurance contract concluded in the interests of the claimant or may be necessary to establish, exercise or defend legal claims. In addition, we have put in place European Commission approved standard contractual clauses to protect your personal information where required. A copy of these clauses is available for your review upon request to us using the 'Contact Us' details provided below.

**Access and other Rights** You may be entitled to ask us for a copy of your personal information, to correct it, erase 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 Us' 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 contact us using the 'Contact Us' details below.

Where we require personal data to comply with legal or contractual obligations, then provision of such data is mandatory: if such data is not provided, then we will not be able to manage your claim or meet obligations placed on us. In all other cases, provision of requested personal data is optional.

If you have unresolved concerns you also have the right to complain to the data protection authority in the country where you live or work or place of the alleged infringement.

**Security and Retention:** We use appropriate technical and organisational measures to safeguard your personal information including practices such as firewalls and encryption.

We will keep your personal information for as long as necessary to fulfil the purposes above or to comply with applicable legal requirements. In most cases, this will be for a period of six years after the insurance file has been closed. For more information on our specific retention policies please contact us using the 'Contact Us' details below.

### **Cookies and other Technologies**

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; and 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 (e.g. to navigate to different pages of the website). We have to use these cookies to make the website work as it should, whether or not you agree to such cookies being used.

We use cookies to estimate our audience size and usage pattern, 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.

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 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/>.

**Links to Other Websites:** 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.

**Children:** Sompo only collects personal information in relation to children under the age of 18 where necessary for insurance purposes. In the event that we learn that we have collected such information concerning a child under 18 in other circumstances, the information will be deleted from our database as soon as reasonably possible.

**Changes to this Policy:** Sompo may, from time to time, determine that changes in its policies, including this Policy, are prudent. If any such changes are made, they will be posted on our Site or where required by applicable data protection laws you will be notified via other means.

**Contact Us:** Sompo is the data controller of your personal information. Sompo is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority (Register Number 202894).

If you have any questions regarding this statement or our data collection practices or you wish to exercise any of your rights under applicable data protection laws, please contact us at:

[privacy@sompo-intl.com](mailto:privacy@sompo-intl.com)