

GENERAL PRIVACY POLICY

1.0 Introduction

1.1 Our Commitment to Respecting Your Privacy. Sompo International¹ is committed to protecting your privacy and respecting the privacy rights and data protection rights you have under applicable law and regulations. This general privacy policy ("Policy") describes the personal information Sompo International¹ ("we" or "us" or "SIHL" or "our") collects and how we use that personal information in our business. This Policy also describes your data protection rights.² Our goal is the responsible and secure handling of personal information. We strive to achieve a proper and fair balancing of your legal rights with the benefits of our activities and our legal obligations and regulatory requirements.

1.2 What is Personal Information? As used in this Policy, personal information means data or information which may be used to identify you and other individuals, including, for example, your partner or members of your family, and includes all data and information about you or other individuals that we are required to protect in accordance with applicable laws and regulations. Personal information, for example, includes information we collect about insurance applicants, policyholders, beneficiaries, third party claimants, visitors to our website at www.sompo-intl.com (the "Site") and information collected through the use of cookies and related technologies on our Site.

1.3 Personal Information from Others. Personal information also includes personal information our third-party business partners and vendors and other SIHL affiliates collect and provide to us. For example, we obtain such information from insurance agents, brokers and producers, claims investigators, witnesses, medical professionals, driving and vehicle licensing authorities, credit reference agencies, your employer, and other third parties and service providers. We also combine information from other sources with information you provide us.

1.4 How We Collect Personal Information. We collect personal 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 or through other communications.

1.5 Providing Personal Information about Others. If you are providing personal information about another individual to us, you must first inform the individual about the content of

¹ The term "Sompo International" refers to and includes each and every subsidiary of Sompo International Holdings Ltd., a Bermuda exempted company ("SIHL"). To the extent, however, that an affiliate of SIH that is not a subsidiary of SIH receives or uses personal information that is covered by this 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. For a list of Sompo International offices, please see <https://www.sompo-intl.com/location/corporate>. For a list of affiliates that are included in the Sompo Group, please see https://www.sompo-hd.com/en/group/group_list/.

² More information about your rights, (including a right to object) and how to exercise such rights, is set out in the Access and Other Rights section.

this Policy and any other supplemental or additional policies we have provided to you (for a list of our supplemental, additional policies, please see https://www.sompo-intl.com/privacy_policies). You must also, where possible, obtain permission from such individuals to share their personal information with us in accordance with this Policy and any other supplemental or additional policies.

1.6 Our Supplemental, Additional Specific Privacy Policies. In addition to this general privacy policy, we provide additional supplemental or specific information about our privacy practices at other times at which you provide information for a particular purpose or do business with us, including when you are applying for a product or service from us, making a claim or doing business with us. Please see https://www.sompo-intl.com/privacy_policies for the most current versions of our supplemental and specific privacy notices, including translations of our policies into other languages.

2.0 The Personal Information We Collect

2.1 Policyholders and Claimants. When you or a third party on your behalf applies for an insurance contract or other service or asserts a claim to recover under an insurance policy we have issued, we collect information about you and other relevant persons or entities that is necessary or appropriate for us to consider and review to carry out our business and comply with applicable laws and regulations. The information we collect may include your name, contact information including email address, gender, marital and family status, date and place of birth, physical characteristics appropriate in the circumstances, educational background, employer details and employment history, skills and experience, professional licenses, memberships and affiliations, dates and causes of property damage, loss, theft, injury, disability or death, records of personal activities such as driving and details about a dispute, claim or proceeding involving you, social security or national insurance identifier, passport number, tax identification number, driver's license number or other government issued identification, financial information, credit history, medical history, current or previous physical, mental or medical condition, medical diagnosis, health status, injury or disability information, medical procedures performed or treatments given or personal habits such as smoking, alcohol consumption, prescriptions, information about criminal records or civil litigation history and other such information that is collected and used in the insurance industry. 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 or to pay a claim under an insurance policy.

2.2 Employees and Corporate Policies. We also hold such personal information if you are an employee or other beneficiary under a corporate policy taken out by your employer.

2.3 Vendors and Business Partners and Industry Information. We will process for underwriting, claims management, marketing, distribution, accounting, vendor management, research, risk management and other business purposes certain information about individuals and entities within organizations 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.

2.4 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.

2.5 Other Information. We also may monitor or record telephone calls, emails, SMS messages or other communications, CCTV recordings, mobile phone tracking information, embedded chips and other information that we acquire through other means, technology or techniques in the conduct of our business. We use this information in connection with our insurance, reinsurance and other business activities, including whether to issue an insurance policy, reinsurance contract, claims assessment, administration and settlement of claims, resolution of claims disputes and other relevant purposes permitted by applicable law and regulations.

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

3.1 General Use of Personal Information in the Insurance Industry. For a thorough and detailed description of how personal information is used generally in the insurance business, we recommend that you review the London Market Core Uses Information Notice provided by the Lloyd's Market Association at <https://www.londonmarketgroup.co.uk/gdpr>

3.2 How We Use Your Personal Information. We use your personal information in many different ways in various aspects of our business and operations when you seek to purchase a product or service, or benefit from our product or service. Personal information will be used for different purposes if you are a policyholder, insured or claimant under an insurance policy, an insurance broker or a representative, witness or another individual with whom we have a relationship. The main purposes for which we use personal information include:

- (i) Communicating with you or verifying your identity;
- (ii) identifying and assessing risk and making decisions, including underwriting decisions about the terms and provisions of an insurance policy or other product or service we may offer or issue to you,
- (iii) accepting payments and assessing your eligibility for payment plans for premiums or other payments;
- (iv) communicating with you or appropriate third parties about our products or services, including managing complaints to government regulators and the handling of requests for data access or data correction or the exercise of an individual's data protection or associated rights;
- (v) administering insurance, credit and related services or other products for you or others that benefit from such services;
- (vi) managing claims and claims related activities associated with an insurance or reinsurance contract and making decisions about such claims matters, claims settlements, dispute resolution as well as recovery from, or cost or loss sharing

allocation with, other insurers or reinsurers or other assistance or services we may provide to you;

- (viii) identifying debtors or beneficiaries and recovering debt;
- (ix) 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;
- (x) 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;
- (xi) managing, reporting and auditing our business operations;
- (xii) researching, developing and applying risk management and statistical analyses;
- (xiii) establishing, exercising or defending legal claims;
- (xiv) protecting our business operations and those of our affiliates, business partners or you;
- (xv) enforcing the terms or conditions of legal contracts and pursuing available remedies and limiting our damages;
- (xvi) meeting regulatory and compliance requirements; and
- (xvii) 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.

3.3 Use of Your Information to Prevent Fraud and Money Laundering and for Anti-Terrorism. As an organization in the business of insurance and reinsurance, we are required to use certain categories of information we collect about you (for example, any health data or criminal records data as part of a claim or political affiliations or criminal records data) for prevention of fraud, terrorist financing, money laundering or the prevention or detection of other unlawful acts where this is necessary for reasons of substantial public interest as defined by applicable laws or as otherwise authorized by applicable laws. To the extent, therefore, that applicable laws consider the use or processing of any data or information that we collect as necessary for the tasks we perform or in the substantial public interest, then we will collect and use the data for such purposes.

3.4 Balancing Legitimate Business Interests and Your Privacy. We have carried out balancing tests for all the processing of personal information we carry out on the basis of our legitimate business interests, as described above. You can obtain information on any of our balancing tests by contacting us using the Contact details described below.

3.5 Our Legitimate Business Interests. Where we rely on our legitimate business interests to justify the purposes for using your personal information and where it is useful to provide you with a more specific description of how we collect and use personal information, those legitimate interests will be set out in a supplemental privacy notice that is tailored specifically to the relationship we have with you. For the most part, however, our legitimate interests for using your personal information will usually be:

- (i) pursuit of our business and commercial objectives;
- (ii) compliance with applicable laws and regulations and our obligations to comply with the guidelines, standards and codes of conduct that apply to us in our business;
- (iii) protection of our customers and employees and our own business, our shareholders and other parties to whom we are obligated or owe a legal duty;
- (iv) analysis of competition in the market for our services or products, including research;
- (v) matters of necessary or important public interest such as anti-money laundering and terrorist financing laws and regulations and other laws aimed at preventing financial crimes; and
- (vi) other justifications that may also apply depending upon the particular circumstances or the applicable law or regulation.

4.0 How We Share Your Information

4.1 Sharing Your Information as Part of Our Business. For the purposes described in this Policy, we share your information in our business activities with:

- (i) SIHL affiliates, including affiliates of Sompo Holdings, Inc. (for additional information, the privacy policy of Sompo Holdings, Inc. is located at <https://www.sompo-hd.com/en/company/privacy/sengen/>). We belong to the Sompo Group of companies. The Sompo Group has companies throughout the world, both inside and outside Europe. We share your information with other group companies for our business and for the Sompo Group's administrative and accounting purposes;
- (ii) brokers, producers, insurance agents, other insurers, reinsurers and underwriters, other intermediaries and agents, appointed representatives, distributors, marketing partners and financial institutions, securities firms or entities with which we do business;
- (iii) government authorities and law enforcement agencies;

- (iv) government agencies and industry associates engaged in fraud prevention, antiterrorism, anti-money laundering or sanctions activities;
- (v) parties that have, or are interested in acquiring, a financial interest in the insurance or reinsurance policy or other contract used in our businesses;
- (vi) third parties that assist us in carrying out our business activities such as third party claims administrators, document and records management providers, claims investigators and adjusters, medical and health professionals, security professionals, property experts, engineers, construction consultants, financial advisers, accountants and actuaries, surveyors, loss adjusters, claims agents, experts, solicitors, private investigators and others that assist us in receiving, reviewing, confirming, auditing or contesting insurance or reinsurance claims or defending the interests of an insured or the reinsurer in an insurance or reinsurance matter;
- (vii) central government registries;
- (viii) 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 have data about you and our businesses;
- (ix) other parties in accordance with applicable laws and regulations;
- (x) parties in connection with a corporate or portfolio transaction, including a potential or actual sale, reorganization, or divestiture of a company, or the sale of any combination of our assets, products, services, or businesses;
- (xi) parties in the course of a bankruptcy, dissolution or similar transactions or proceedings; and
- (xii) otherwise with your consent;

4.2 Protection of Your Information that is Shared. If we share your personal information, we have appropriate non-disclosure and data security requirements in place to the extent required by applicable law and regulations.

5.0 Where You Give Us Consent

5.1 Request for Your Consent. You will be requested to give us consent to use your information for the following purposes:

- (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 us;
- (ii) to place cookies on our Site (as described below); or
- (iii) for other specific purposes in which we request or use the information for the purpose that is explained at that time.

5.2 Your Right to Withdraw Your Consent. If we rely on consent to use your information in accordance with applicable law and regulations, you have the right to 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 Sharing Information to Prevent Fraud, Terrorism, Money Laundering and Other Criminal Activities. Insurers commonly collect, hold and share information about policyholders and claimants for the purposes of detection and investigation of fraud, money laundering and other criminal activities. To prevent and detect potential fraud, terrorism activities, money laundering or other illegal or improper activities and to comply with applicable sanctions laws and regulations, we share your information with other organizations, industry databases, public bodies and law enforcement and national security authorities in many countries and around the globe. With such sharing of such information, your information will appear in registers of claims shared between different insurance providers, is available for search of previous claims when assessing a claim, and is included in fraud prevention agencies databases and law enforcement agencies. Your information is also used for the following purposes:

- (i) to confirm, verify or share details about underwriting information or claims information;
- (ii) to ensure we have not been given incorrect, false or inaccurate information and to prevent potential or actual fraud or other illegal activity (we will also note this in the appropriate record or file we keep); or
- (iii) 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 Sharing Your Information with Law Enforcement and Other Government Agencies. Law enforcement and other governmental agencies access and use the information shared in these circumstances for law enforcement and other governmental purposes. We and other insurance bodies and governmental agencies also access and use information you provide without additional consent from you.

6.3 For Additional Information from Government Agencies. For additional information about the organizations or persons with which or whom we share information for these purposes, please use the Contact information below. For additional information about how these organizations or persons use this information, please direct your inquiry to the relevant agency or your local governmental agency that has jurisdiction over insurance or financial institutions, data privacy or other such matters. A list of data protection agencies is included below.

7.0 International and Global Transfers

7.1 How Your Information is Transferred Around the Globe. The global nature of our business and the services we provide require us to transfer around the globe the personal information we collect. We transfer personal information within and outside the European Economic Area, the United Kingdom, the United States of America, Bermuda, Switzerland, Italy, Spain, Germany, Belgium, Luxembourg, France, Japan, Singapore, Mexico and other countries. For a list of our locations around the globe, please see <https://www.sompo-intl.com/location/corporate>. For a list of entities within the Sompo Group please see https://www.sompo-hd.com/en/group/group_list/.

7.2 Why We Transfer Your Information Around the Globe. Such transfers around the globe are often necessary to conclude or perform the insurance contract or other services or products we provide or that are necessary to establish, exercise or defend legal claims.

7.3 Data Protection When We Transfer Your Information Around the Globe. When transferring such information, we comply with the applicable laws and regulations concerning the required protection of such information, including the applicable laws and regulations of your country. This often involves the use of data transfer agreements or similar contractual provisions approved by the European Commission and permitted under Article 46 of the EU General Data Protection Regulation (“GDPR”). If there is no data transfer agreement in place, we use other mechanisms recognized by the GDPR or other applicable law as ensuring an adequate level of protection for personal information and data transferred outside the European Economic Area. For additional information, please see the Sompo International Vendor Requirements for Compliance with General Data Protection Regulation at https://www.sompo-intl.com/privacy_policies.

8.0 Access and Other Rights

8.1 Request for Your Personal Information and Your Rights to Correct, Restrict or Erase It and Withdraw Your Consent. You are entitled to ask us for a copy of your personal information, to correct it, erase it or restrict its processing, and to ask us to transfer some of this information to other organizations. You 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 have the right to opt out of receiving marketing communications from us at any time by using the Contact details below. These rights are limited in some situations, including, for example, where we can demonstrate that we have a legal requirement to process your data. These rights are set out in applicable data protection laws (see, for example, Chapter III of the EU General Data Protection Regulation 2016/679). In some instances, this means that we are able to retain data even if you

withdraw your consent. If you wish to exercise any of your rights, please notify us by using the Contact details below.

8.2 When You Are Required to Provide Personal Information. If we require personal information to comply with applicable legal or contractual obligations, then you must provide such information. If such information 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 information is not required by us to perform our obligations or provide the requested service, then providing the requested personal information is optional.

8.3 Additional Information from Data Protection Authorities. 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. For your information, here is the contact information for the following data protection authorities:

United Kingdom

The Information Commissioner's Office at www.ico.org.uk.

Details of how to make a complaint are set out here:

<https://ico.org.uk/make-a-complaint/>.

Belgium

Belgian Data Protection Authority:

<https://www.dataprotectionauthority.be/contact-us>,

Rue de la Presse 35, 1000 Brussels.

France

Commission Nationale de l'Informatique et des Libertés, 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07, France

Germany

Please see:

https://www.lidi.nrw.de/LDI_EnglishCorner/mainmenu_DataProtection/Inhalt2/authorities/authorities.php

Italy

Garante per la Protezione dei Dati Personali.

Complaints can be lodged at: www.garanteprivacy.it

Luxembourg

National Commission for data protection

Commission nationale pour la protection des données,

1, avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, (+352) 26 10 60 -1.

To submit a claim online:

<https://cnpd.public.lu/en/particuliers/faire-valoir/formulaire-plainte.html>

Netherlands

The Data Protection Authority / Autoriteit Persoonsgegevens at

www.autoriteitpersoonsgegevens.nl.

Details of how to make a complaint are set out here:

www.autoriteitpersoonsgegevens.nl/nl/zelf-doen/privacyrechten/klacht-indienen-bij-de-ap

Spain

Spanish Data Protection Agency,

Jorge Juan, 6, 28001 – Madrid (Spain).

<http://www.aepd.es>,

9.0 Security and Retention

9.1 Measures to Protect Your Information. We use appropriate, feasible information security and legal measures and technology where necessary to protect your personal information, including firewalls and encryption that comply with applicable data protection laws. As most of the personal information and data that we hold is stored electronically, we have implemented appropriate measures to secure it. We have procedures in place at our premises to secure the hard copy records. We regularly train our staff who have contact with personal information and data on proper data protection and information security. When we engage a third party to collect or otherwise process personal information on our behalf, such third parties are required to protect the confidentiality and secure such personal information in accordance with their contractual obligations to us.

9.2 How Long We Retain Your Personal Information. 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. The precise period of time will depend upon the purpose for which we hold your information. As a regulated organization, there are laws and regulations that apply to us that set out a minimum period of retention of personal information and data. We will, therefore, hold personal information and data, for a period of time that is at least necessary to comply with applicable law but may be longer if holding it is necessary in our business (for example, for an insurance policy or for claims handling). For more information on our specific retention policies please inquire utilizing the Contact details below.

9.3 If You Suspect Your Information is Not Secure or Has Been Compromised. If, at any time, you have reason to believe that your personal information with us is not secure or has been compromised, then please immediately notify us using the Contact information below.

10.0 Cookies and other Technologies

10.1 How We Collect Information from You through Our Website and Use of Cookies. 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 proper 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 intended, and you are required to use them if you want to use our Site properly.

10.2 We use Cookies for Tracking Users and Usage Patterns. We also use cookies to estimate the number of users accessing the Site and usage patterns, to recognize 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 Your Consent to Our Cookies. In order to place most types of cookies on your device, we require your consent, which we will obtain when you first visit our Site. If you do not want to allow cookies at all, or only want to allow the use of certain cookies, please refer to your browser settings. You can also use your browser settings to withdraw your consent to our use of cookies at any time and delete cookies that have already been set. Each browser is different, so please look at your browser's "Help" menu or instructions to learn the correct way to modify your cookie settings or to determine how to delete the cookies we have set on your device. You should also consult with your browser's provider or manufacturer if you have any questions regarding disabling cookies. However, if you choose to reject our cookie, you will 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/>.

10.4 How We Use Your Information from our Site in Data Processing and Analytics. In our business we use data processing and internet analytics about users of our Site provided by various third parties. Third party services such as Google Analytics provided by Google, Inc. often use cookies and other tracking technologies to allow us to see who is using our Site and how our Site is used. Such service providers use and share personal information about your visits to our Site. The use and sharing of such data and information is described by each such third-party provider. For Google, Inc. the use and sharing of such information is included in the Google Analytics Terms of Use available at <https://www.google.com/analytics/terms/us.html> and the Google Privacy Policy available at <http://www.google.com/policies/privacy/>. The Google Terms of Use and Google Privacy Policy and the terms of use and privacy policies of other such third parties are subject to change by such third party from time to time.

As noted above, you can prevent Google Analytics and any other such service providers from recognizing you on return visits to our sites by disabling cookies in your browser. Google, for example, provides an "opt-out" tool that must be installed in your browser. According to Google, this tool is intended to prevent your browser from making your site activity available to Google Analytics. The Google Analytics Opt-out Browser Add-on is available at <https://tools.google.com/dlpage/gaoptout>. We are, however, not responsible for this tool. If you choose to use it or go through the opt-out process, you do so at your own risk.

11. Links to Other Websites; Use by Children

11.1 Access to Other Sites from Our Site. Our Site contains 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 Information About Children Under 18. SIHL does not knowingly collect personally identifying information from children under the age of 18. If 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

SIHL will, from time to time, determine that changes in this Policy are prudent or required by changes in applicable law. If any such change is made, it will be posted on our Site. If required by applicable laws, we will provide reasonable notice by other means of communication. The applicable version of this Policy that will apply to SIHL'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 privacy@sompo-intl.com or write us at the address below.

14. Contact Us

SIHL is authorized by various governmental agencies and authorities in many countries to conduct and operate its businesses in many countries. 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)

15. Policy Version. This Policy was last updated January 2019.