

Luxembourg Professional Secrecy - Outsourced Services

As a Luxembourg insurance undertaking, SI Insurance (Europe), SA (**SIIE**) is subject to an obligation to professional secrecy under the Luxembourg Act of 7 December 2015 on the insurance sector, as amended (the "**Act**").

Under the Act, SIIE as well as its directors, officers, managers, employees and services providers are, as a matter of principle, prevented from disclosing the information confided to them in the course of their professional activity or in the exercise of their mandate (the **Protected Information**).

By way of derogation, SIIE may transfer Protected Information to the entities in charge of the provision of outsourced services on behalf of SIIE (the **Service Providers**).

This information is provided in application to the Act and is deemed accepted by the policyholder through the signing of the application form for insurance or the insurance contract, or the payment of the policy premium.

Type of services outsourced

The types of services that we may outsource include all tasks necessary to perform the offer, distribution, management and termination of our insurance products or services, as well as the compliance with our obligations under corporate governance and regulatory provisions.

Such tasks include insurance distribution, underwriting support, client on-boarding, policy administration, claims handling, client contact and relationships, legal assistance, actuarial and reserving, finance and accounting, risk management, compliance, HR/administration, IT, regulatory reporting and internal audit, while retaining the final responsibility with Luxembourg based relevant (key) function holders.

Type of information transmitted

Protected Information that might be transmitted by SIIE to a Service Provider in the context of the outsourcing includes any data which may directly or indirectly identify a client, an insured, a beneficiary under the insurance policy or any representative of such persons.

This includes personal data, documents and information including medical or sensitive data, as well as business data including data not publicly available.

SI Insurance (Europe), SA

A wholly owned subsidiary of Sompo International Holdings Ltd.

Registered Office Address: 40, Avenue Monterey, L-2163 Luxembourg, Grand Duchy of Luxembourg
+352 27 87 26 06

www.sompo-intl.com

Countries where the Service Providers are located

Countries part of the European Economic Area, Bermuda, India, Mexico, Serbia, Singapore, South Africa, United Kingdom and United States of America. The list is not fixed and can be updated on an ongoing basis once the change in the Service Providers and their locations arise.

Contact

If you have any question in relation to the above information, please contact:

Mr Todd Corey, Head of Legal and Compliance at tcorey@sompo-intl.com

Ms Renata Virzintaite, Compliance Officer at rvirzintaite@sompo-intl.com