

PRIVACY NOTICES OUTSOURCERS (INCLUDING INTERMEDIARIES), CONSULTANTS
 STONEFORT INSURANCE HOLDINGS S.A. and all subsidiaries (**COMPANY**) has instituted a comprehensive data protection compliance framework, in line with the Data Protection legislation, in order to fulfil its responsibilities and ensure adequate protection of the personal data of all the individuals it enters into a relationship.

This document provides information about the way all the entities of the **COMPANY** treats personal data of its outsourcer, insurance intermediary and consultants.

- 1.1 **PERSONAL DATA PROCESSING.** The **COMPANY** entity to which you provide services or are in business with collects and processes personal data on you. The **COMPANY** acts as the controller of such processing and is committed to respecting your privacy and protecting your personal data in accordance with the law, in particular the EU General Data Protection Regulation 2016/679 (**GDPR**).
- 1.2 **PROCESSING PURPOSES.** The processing of your data is based on the following grounds:

PURPOSE OF PROCESSING	GDPR LEGAL BASIS
The COMPANY processes your data:	The processing is necessary:
- for purposes of usual supplier/business partner management (including orders, deliveries, transactions, payments, remuneration or commissions),	- for the performance of a contract with you, to comply with legal obligations to which the COMPANY is subject and for purposes of legitimate interests pursued by COMPANY .
- for risk management, compliance and due diligence purposes, for on-boarding ongoing monitoring, (including fit & proper or background checks where relevant),	
- in the context of the service evaluation (notably on the quality of service, SLA monitoring, global efficiency or profitability),	
- for accounting tasks and legal documentation.	

In exceptional cases, the **COMPANY** may need your consent for certain processing operations. In such case, the **COMPANY** will ask for your consent separately.

- 1.3 **DATA CATEGORIES.** The **COMPANY** may collect from you and process the following categories of personal data for legal representative and/or directors of the outsourcer, insurance intermediary or consultant: personal identification data (name, birth date), public identification data (passport data, ID card), professional information (job title) and legal data (criminal record, where applicable, declaration of honour).
- 1.4 **DATA RECIPIENTS.** The **COMPANY** may share your data with other entities of the **COMPANY** group, third-party partners/providers, including : insurance and reinsurance companies, intermediaries, brokers, actuaries, auditors, advisors, consultants, lawyers, banks, counterparties and third parties involved in claims (including witnesses and experts), competent courts, authorities and adverse parties, as necessary to perform operations and deliver services to you and, where required by law, with competent local regulators and authorities.
- 1.5 **DATA TRANSFERS OUTSIDE THE EU/EEA.** The **COMPANY** does not transfer your personal data outside the EU/EEA for its own internal purposes. However, if an insured person or property is located, or insurance claims or related dispute/litigation take place, outside the EU/EEA, the **COMPANY** may transfer your data to the relevant jurisdiction, including to countries which do not

have a similar level of protection of personal data as the EU. In such an event, and in accordance with GDPR, data transfers will:

- a) be limited to what is necessary to perform the contract with you, or conclude a contract with a third-party in your interest, or
- b) be justified by the establishment, exercise or defence of legal claims, or
- c) if appropriate, be covered by appropriate safeguards, such as entering into EC approved standard contractual clauses, or

1.6 DATA RETENTION. The COMPANY will retain your personal data for as long as required by applicable law (typically, 2 months for criminal records and 10 years for other documentation).

1.7 YOUR STATUTORY RIGHTS. You have certain rights concerning your personal data under GDPR as mentioned below, and can exercise them by contacting the COMPANY's Data Protection Officer at [dpo@stonefort.com].

- a. **Right to information.** If you are an insured party and not the policyholder, the COMPANY may not have your current details and thus cannot contact you conveniently and in confidentiality. You can find updated information on the COMPANY's processing of your data at any time on this website <http://stonefort.com>, or by contacting the COMPANY's Data Protection Officer at [dpo@stonefort.com].
- b. **Access right.** You have the right to get access to your personal data.
- c. **Right to rectification.** You can ask the COMPANY to rectify, correct or update inaccurate and/or incorrect data.
- d. **Other rights.** In certain limited cases (in which case the COMPANY first analyse whether the conditions for the exercise of such rights are fulfilled, in line with GDPR), you may object to, or request the limitation of, the processing of your personal data, or request the erasure or portability of your personal data. Where you have given your consent to specific processing, you have the right to withdraw such consent (for future processing). You should note that the law authorizes the COMPANY to retain and continue processing certain personal data, even if you have exercised your rights to object or ask for erasure or -if applicable- withdraw your consent: this is the case in particular where the COMPANY has legitimate and compelling reasons for continuing the processing, such as compliance with applicable law. Finally, you can contact the Luxembourg data protection authority (Commission nationale pour la protection des données - <https://cnpd.public.lu/en.html>) to lodge a complaint.

1.8 DATA PROTECTION OFFICER. The COMPANY has appointed a data protection officer, who can be contacted at [dpo@stonefort.com].