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PRIVACY NOTICE FOR POLICYHOLDERS

STONEFORT INSURANCE SA (the “COMPANY”) is committed to protecting your personal data in accordance with the EU General Data Protection Regulation (GDPR) 2016/679.

This Privacy Notice explains how the COMPANY collects, processes and protects personal data on you when you take out an insurance policy or a third-party takes out an insurance policy for which you are an insured party.

1.1 PERSONAL DATA PROCESSING

The COMPANY collects and processes personal data on you. The COMPANY acts as the data controller for the processing of your personal data.

1.2 PROCESSING PURPOSES

The COMPANY processes your personal data for the following purposes, based on the corresponding legal bases under the GDPR:

PURPOSE OF PROCESSING	GDPR LEGAL BASIS
The COMPANY processes your data:	The processing is necessary:
- to decide whether or not to enter into or maintain a business relationship with you	- in order to take steps prior to entering into a contract with you (Article 6(1)(b) GDPR), and for purposes of legitimate interests pursued by the COMPANY (Article 6(1)(f) GDPR)
- to manage insurance policies, underwriting, claims and payments	- for the performance of a contract with you (Article 6(1)(b) GDPR)
- to determine, invoice and recover premiums and sums due	- to comply with legal obligations to which the COMPANY is subject (Article 6(1)(c) GDPR)
- to evaluate and manage risks, fight against fraud, manage disputes and litigation	- for purposes of legitimate interests pursued by the COMPANY (Article 6(1)(f) GDPR)
- to better know you as required by law (in particular with respect to anti-money laundering rules)	- for purposes of compliance with legal obligations to which the COMPANY is subject (Article 6(1)(c) GDPR)

In exceptional cases, the COMPANY may need your consent for certain processing operations. In such cases, the COMPANY will ask for your consent separately, in accordance with Article 6(1)(a) GDPR. Consent will be freely given, specific, informed, and unambiguous, and you will have the right to withdraw your consent at any time without affecting the lawfulness of prior processing.

1.3 DATA CATEGORIES

In addition to the information you have communicated to the COMPANY directly or through our insurance intermediary or your broker, the COMPANY may collect and process the following categories of personal data on you and other insurance beneficiaries:

- a. Personal identification data (including passport/ID) and contact details,
- b. Insurance policies, premiums, payments, and claims details,
- c. Customer due diligence data and reports,
- d. Information on insurance claims, including damage to property, liabilities, and health data (only for claims management purposes in compliance with article 9(2) GDPR for the processing of sensitive data such as health data),
- e. information on dispute and litigation management.

If you provide personal data on third-party insured persons (whether beneficiaries, other insured persons, your relatives, employees or anyone else) to the COMPANY or our insurance intermediary or your broker, you should make sure you have informed them accordingly.

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, should this happen in the future and in accordance with GDPR, such 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 defense of legal claims, or
- c. be covered by appropriate safeguards, such as entering into EC-approved Standard Contractual Clauses (SCCs) as required under GDPR, or
- d. in exceptional cases, occur with your consent. In such cases, the COMPANY will ask for your consent separately.

1.6 DATA RETENTION

The COMPANY will retain your personal data for as long as required to deliver the services you have requested, and then for the mandatory retention duration set forth by applicable law (which can vary between 10 and 40 years depending on the type of data processing).

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.** You have the right to be informed about the collection and use of your personal data by the COMPANY. This includes details about the purposes of processing, the categories of personal data processed, data retention periods, and who the data is shared with. This information is contained in this policy. Should you have any further questions about how your data is being handled, you can contact the COMPANY's Data Protection Officer at [dpo@stonefort.com].
- b. **Access right.** You have the right to access your personal data.
- c. **Right to rectification.** You can ask the COMPANY to rectify, correct or update inaccurate and/or incorrect data.
- d. **Right to Erasure, Restriction, or Objection:** In certain situations, you may request the erasure, restriction, or object to the processing of your data, subject to legal obligations.
- e. **Right to Data Portability:** You may request that your data be transferred to another service provider.
- f. **Right to Object to automated decision-making.** If applicable, you also have the right to object to automated decision-making, including profiling, as per Article 22 GDPR.

In cases where the COMPANY is required to retain or continue processing your data for legal reasons, your rights may be subject to certain restrictions.

In case of a personal data breach that poses a risk to your rights and freedoms, the COMPANY will notify you and the supervisory authority as per Articles 33 and 34 GDPR.

1.8 LODGING A COMPLAINT

You also have the right to lodge a complaint with the local data protection authority if you believe that the COMPANY has not complied with applicable data protection laws:

National Data Protection Commission (CNPD)

Telephone: (+352) 26 10 60 -1

Email: info@cnpd.lu

Website: <https://www.cnpd.lu>

Address: 15, Boulevard du Jazz, L-4370 Belvaux

1.9 DATA PROTECTION OFFICER

The COMPANY has appointed a data protection officer, who can be contacted at [dpo@stonefort.com] for any questions or concerns regarding your personal data.