

Stonefort Insurance Holdings S.A. – 8C, rue Collart, L-8414 Steinfort ● Luxembourg ●
Tel: (+352) 26 10 65-1001 ● Fax: (+352) 26 10 65-1065
R.C.S Luxembourg: B 180.477 ● Matricule: 2013 22 18774 ● Identification TVA: LU27396826

PRIVACY NOTICE FOR BUSINESS CLIENTS

STONEFORT INSURANCE HOLDINGS AND ITS DIRECT AFFILIATE SUBSIDIARIES (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 your personal data as a legal representative/director and controlling person of the entity having a business relationship with the COMPANY.

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:
- for purposes of usual business client management (including cash transactions, credit and debit, commissions, premiums, claims, etc.),	- for the performance of a contract (Article 6(1)(b) GDPR)
- for risk management, compliance and due diligence purposes, for on-boarding ongoing monitoring, (including AML or background checks where relevant), and	- for purposes of legitimate interests pursued by the COMPANY (Article 6(1)(f) GDPR)
- for accounting tasks and legal documentation.	- to comply 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

The COMPANY may collect from you and process the following categories of personal data as a legal representative and/or directors of business clients:

- a. Personal identification data (e.g., name, nationality, gender, birthdate, passport data, ID card)
- b. Professional information (job title)
- c. Checks and Due Diligence (results of screening and checks, matching against public lists, information from sources such as CDDs, Factiva, Bloomberg)
- d. Public Office (PEP status - sensitive data processed solely to determine whether you hold a public office, not to reveal political opinions).

1.4 DATA RECIPIENTS

The COMPANY may share your data with other entities of the COMPANY group, third-party partners/providers (including auditors, advisors, consultants, lawyers) and, where required by law, to 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 defence of legal claims, or
- c. if appropriate, be covered by appropriate safeguards, such as entering into EC approved standard contractual clauses.

1.6 DATA RETENTION

The COMPANY will retain your personal data for as long as required by applicable law (typically up to 10 years after contract termination).

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.

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 the event 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 Luxembourg 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 [\[dpo@stonefort.com\]](mailto:dpo@stonefort.com) for any questions or concerns regarding your personal data.