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PRIVACY NOTICE FOR OUTSOURCERS (INCLUDING INTERMEDIARIES), CONSULTANTS

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 personal data of its outsourcer, insurance intermediary and consultants the personal data of its outsourcer, insurance intermediary and consultants.

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 supplier/business partner management (including orders, deliveries, payments, remuneration or commissions),	- for the performance of a contract (Article 6(1)(b) GDPR), and for purposes of legitimate interests pursued by the COMPANY (Article 6(1)(f) GDPR)
- for risk management, compliance and due diligence purposes, for on-boarding monitoring, (including fit & proper or background checks where relevant),	- for purposes of legitimate interests pursued by the COMPANY (Article 6(1)(f) GDPR)
- in the context of the service evaluation (notably on the quality of service, SLA monitoring, global efficiency or profitability),	- to comply with legal obligations to which the COMPANY is subject (Article 6(1)(c) 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 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 a legal representative and/or directors of the outsourcer, insurance intermediaries or consultant

- a. Personal identification data (e.g., name, nationality, gender, birthdate, passport data, ID card)
- b. Professional information (job title)
- c. Legal information (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
- 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 by applicable law (typically 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 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 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] for any questions or concerns regarding your personal data