

## PRIVACY NOTICE FOR POLICYHOLDERS

- 1.1 **PERSONAL DATA PROCESSING.** STONEFORT INSURANCE S.A (**COMPANY**) collects and processes 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. 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 **DATA PROTECTION OFFICER.** The COMPANY has appointed a data protection officer, who can be contacted at [*dpo@stonefort.com*].
- 1.3 **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:
- 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, and for purposes of legitimate interests pursued by the COMPANY,
- To manage insurance policies, underwriting, claims and payments	
- to determine, invoice and recover premiums and sums due,	
- to evaluate and manage risks, fight against fraud, manage disputes and litigation, and	- for the performance of a contract with you, and to comply with legal obligations to which the COMPANY is subject,
- to better know you as required by law (in particular with respect to anti-money laundering rules).	- for purposes of legitimate interests pursued by the COMPANY,
-	- to comply with legal obligations to which the COMPANY is subject

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

- 1.4 **DATA CATEGORIES.** 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:
- personal identification data (including passport/ID) and contact details,
  - insurance policies, premiums, payments and claims details,
  - customer due diligence data and reports,
  - information on insurance claims, including damage to property, liabilities, and health data (only for claims management purposes),
  - 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.

- 1.5 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.
- 1.6 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.
  - d. in exceptional cases, with your consent. In such cases, the COMPANY will ask for your consent separately
- 1.7 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).
- 1.8 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](mailto:dpo@stonefort.com)].
  - a. **Right to information.** In certain cases, 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 the website of the COMPANY, or by contacting the COMPANY's Data Protection Officer at [[dpo@stonefort.com](mailto:dpo@stonefort.com)].
  - b. **Access right.** You have the right to access your personal data. The COMPANY processes a large quantity of information, and can thus request, in certain cases and in accordance with GDPR, that before the information is delivered, you specify the information or processing activities to which your request relates.
  - 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 will 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. You should note that the law authorizes the COMPANY to retain and continue processing certain personal data, even where 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.