

EMPLOYEE PRIVACY POLICY

1.0 What does this notice cover?

1.1 This notice describes how Sompo International Holdings Ltd. and its affiliates (“Sompo International”) use and disclose your personal information or data as part of your potential, current or previous employment relationship with an entity within Sompo International. References in this notice to **we**, or **us** shall mean Sompo International (or relevant affiliate within Sompo International) to which you are applying or by which you are currently employed.

2.0 What information do we collect?

2.1 We collect and process personal data about you. This may include, to the extent permitted by applicable law or regulation:

- (i) **Personal Identification and Communication Information:** your picture, name, gender, date of birth, social security number/national personal identification number, home address, personal email address, personal phone number, employee ID number, work contact details (phone, email, and physical address), nationality, immigration status and copies of identity documentation;
- (ii) **Financial Information:** bank account details and social security number/national personal ID number for payment and taxation purposes;
- (iii) **Family, Lifestyle and Social Circumstances Information:** beneficiaries’ details in relation to life and/or health insurance or other benefits, emergency contacts, marital status, information about family members (name, date of birth, gender and social security number/national personal identification number) where necessary for the provision of applicable benefits, guarantees or relocation assistance;
- (iv) **Employment Related Information:** job title, compensation, benefits, professional experience, education and qualifications, performance history, training records, skills, employee background checks, expense records (such as details of out-of-pocket expenses, company cars or private cars where an allowance is claimed and mobile phone costs), in certain countries, information about trade union affiliation and ethnic origin if you have informed us of your trade union membership or asked us to make payments to trade unions or for religious taxes on your behalf, information concerning performance and appraisals, career plans and geographic mobility, conduct and information about actual or alleged violations of laws or breach of Sompo International or company policies, disciplinary proceedings and in certain countries, where permitted, details of professional registrations, and sanctions with professional bodies or criminal convictions where you have consented to a background check;
- (v) **Absence Related Information:** medical leave information, medical certificates, other documents required to confer special benefit status, such as information concerning pregnancy status, etc. where applicable;
- (vi) **Employee Monitoring Information:** desk phone, mobile phone, written and electronic communications, internet usage, and information collected on CCTV and via other access and security controls, including biometric data such as fingerprints.
- (vii) **Information about your use of our systems:** your use of our IT systems and information we obtain from electronic devices such as desktop computers, mobile phones, notebook computers, tablets, GPS devices and other such devices used by, or allocated to you.

(viii) Other Information: information we obtain from other sources that have not yet been identified but that may collect information as they are introduced and used by you in our business.

3.0 How do we use this information, and what is the legal basis for this use?

3.1 If we collect and obtain personal data or information that requires protection under applicable law or regulation, we will comply with all applicable law and regulations and only use the information to the extent permitted by applicable law and regulations.

3.2 Our obligation to comply with applicable law and regulations includes our obligation to obtain your consent to collect and obtain information about you that we may not collect or obtain without your consent.

3.3 When we collect, obtain or process personal data, to the extent permitted by applicable law and regulations, we may use it for the following purposes:

- (i) As required to establish and perform an employment arrangement or contract, to maintain or terminate an employment relationship or to enable you to perform your job. This includes recruiting and hiring, administration of payroll and benefits, establishing your right to work, your absence from work, your compensation, taxation, performance and talent management, training and leadership development, succession planning, award recognition, employee surveys, medical insurance, occupational health, incentive plans, retirement plans, stock plans, expense management and professional travel.
- (ii) As required to enable our business to perform legitimate business functions in accordance with applicable laws and regulations, including:
 - 1. to provide access to our offices, manage our IT systems and infrastructure, collate Sampo International directories and provide communication services such as e-mail, telephone, mobile phone and internet access;
 - 2. to carry out our business functions such as headcount planning, reporting and expense management, quality control and service level verification; and
 - 3. to protect the security of our premises, assets, systems, and intellectual property and enforce Sampo International policies, including monitoring communications and internet usage where permitted by local law and in accordance with our Sampo International's Information Security Policy, and to conduct necessary investigations and disciplinary actions as well as to monitor time at work, absence, performance, vacation/holiday allowances, etc, and to carry out other Human Resource processes.
 - 4. to comply with applicable laws and protect our legitimate business interests and legal rights, including, but not limited to, use in connection with legal claims, health and safety compliance, regulatory, investigative and disciplinary purposes (including disclosure of such information in connection with a legal process or litigation) and other ethics, anti-corruption and compliance reporting tools.
 - 5. to display photos provided to us or obtained by us for contact details in internal directories, in internal communications and newsletters and in external news and media in connection with events and updates about Sampo International's business.
 - 6. to the extent permitted by applicable law and regulation, and with your consent if such consent is required under applicable law and regulation, to conduct

background checks to evaluate eligibility for employment and for security purposes, and to collect and store medical information if a regular or onboarding health check is required or to evaluate eligibility for applicable benefits.

4.0 With whom will we share this data and where?

4.1 Personal data may be transferred to Sampo International companies and contractors, within and outside the country in which you are employed, including outside the EU. It will be stored and processed manually and electronically through global information technology systems and tools for the purposes described in this notice.

4.2 Personal data may be shared with any government authority, including law enforcement and national security officials if required by a government authority or required by applicable law or regulation. Personal data may also be shared with third party service providers, who will process it on our behalf for the purposes described in this notice. Such third parties include, but are not limited to, human resources and payroll service providers, information technology service providers, travel agencies and travel service providers, banks, credit card companies, brokers, medical services and medical insurance providers, training providers, survey service providers, investigators, and employee hotline administrators.

5.0 Where can you find more information about our handling of your data?

For additional information about retention periods, data sharing, international transfers, contact details and your data protection and privacy rights, please see the **[Privacy FAQs below](#)**.

Appendix – Privacy FAQs

What rights do you have concerning your personal data?

You may be entitled to ask us for a copy of your information, to correct, erase or restrict its processing, or to transfer some of this information to other organizations. You may also have rights to object to some processing and, where we have asked for your consent to process your data, to withdraw this consent. These rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your data. In some instances, this may mean that we are able to retain data even if you withdraw your consent.

Where we require personal data to comply with legal or contractual obligations, then provision of such data is mandatory; if such data is not provided, then we will not be able to manage the employment relationship, or to meet obligations placed on us. In all other cases, provision of requested personal data is optional.

If you have any concerns or questions about how we process your data, please contact the Legal & Compliance Department or your Human Resources representative.

If you have any concerns or questions about how we process your data, you may also contact the office of the government agency in the country in which you are employed that has responsibility for protection of personal information or privacy rights.

Which Sompo entity controls your data, and which Sompo International companies might your data be shared with?

The data controller for your information is your employing entity. If you are unsure who this is please check with the Human Resources Department.

Personal data may be transferred to Sompo International companies and contractors, within and outside the country in which you are employed, including outside the EU.

How long will you hold my data?

We will keep this information, together with data retained from the application and selection process, for the course of the employment relationship and, to the extent permitted, after termination of employment. Applicable laws and regulations may require us to hold certain information for specific periods. In other cases, we may retain data for an appropriate period after the employment relationship ends to protect against legal claims, or to administer our business. For additional information about our retention policies see Sompo International's Records Retention Policy.

Who will my data be shared with?

Information contained in internal directories may be accessed by any of our Sompo International companies or affiliates on a worldwide basis. Other personal data will primarily be processed by employees of the Human Resources, IT, Finance, Claims, Legal and Compliance and Facilities departments, where relevant and necessary. Some of these employees and IT systems may be located outside of the country in which you are employed.

If applicable law or regulation requires that we protect information that is transferred outside the country in which you are employed, then we will protect such data in accordance with the applicable laws and regulations. If a third party, service provider or vendor outside the country in which you are employed receives the data, then we will incorporate into the contracts with such third party, service provider or vendor the required clauses that comply with applicable laws and regulations concerning the protection of such data. If you require more information about the protection provisions we have in place, please contact the Legal & Compliance Department or the Human Resources Department.