

*N.B. The English text is a translation of the Swedish original text. In case of any discrepancies the Swedish text shall prevail.*

## **DATA PROTECTION POLICY**

### **1. Background**

AmTrust (as defined below) is dedicated to protecting your privacy. This data protection policy explains how AmTrust collects and use your personal data. It also describes your rights towards us and how to exercise them. Unless otherwise stated below, this data protection policy applies to AmTrust Nordic's (as defined below), and the Insurer's (as defined below) processing of personal data.

The insurance provider to your insurance is either AmTrust International Underwriters DAC (169384) or AmTrust Europe Ltd (1229676) (as applicable the "**Insurer**"). You will find information with respect to which company that is your insurance provider in insurance agreement, the pre-purchase information and the insurance terms and conditions of your insurance. When the Insurer process your personal data, the Insurer is the controller of such processing.

AmTrust Nordic AB (556671-5677) ("**AmTrust Nordic**") is the Insurer's general agent and represent the Insurer in matters concerning the insurance which you have subscribed. AmTrust Nordic will in its capacity as general agent administer your insurance with the Insurer, handle possible complaints and may also perform the claims handling. When AmTrust Nordic, in its capacity as general agent, process your personal data, AmTrust Nordic is the controller of such processing.

This data protection policy is common for AmTrust Nordic and the Insurer (AmTrust Nordic and the Insurer are hereinafter jointly referred to as "**AmTrust**", "**us**", or "**we**"). To the extent a specific processing of personal data only is relevant for one of the companies this is explicitly noted in this policy.

Throughout this privacy policy the term "processing" is used which covers all activities involving your personal data, including collecting, handling, storing, sharing, accessing, using, transferring and disposing of information.

### **2. Information that we may collect or receive about you**

We may collect and process personal information that you provide directly to us by filling out forms, through our website, by phone or via mobile apps, or as we receive through third parties (for example, public records, insurance brokers, tied agents, claims investigators, claims handlers and business partners). This may include the following categories of data:

- **General identification and contact information:** Name; address; e-mail and telephone number; personal identification number or similar identity number; gender; marital status; relationship with the policyholder, insured or claimant; and membership (information that we receive from you or a third party).
- **Information enabling us to provide products and services:** Location and identification number or similar information to identify insured property (for example unique identity number such as the phone IMEI-number, real-estate number or address or vehicle registration number); information regarding loans or credits if the insurance concern payment protection; information about travel arrangements to the extent the insurance concern travel insurance; age and categories of

individuals you wish to insure; information about your current employment; membership; previous claims; other insurances you subscribed for; and date and cause/background of/to a claim made (Information that we receive from you or a third party).

- **Financial information and account details:** Payment card number; bank account number and account details; credit history and credit score; assets; income; and other financial information (Information that we receive from you or a third party).
- **Sensitive information:** We may process the following sensitive information about you; (a) data concerning health such as current or former physical or mental or medical condition and medical history and (b) union membership (for example if you apply for an insurance that has been procured by or offered through a union) (Information that we receive from you or a third party).
- **Information which is necessary to discover, prevent or investigate fraud or investigations towards financial sanctions lists:** We may process personal data to enable us to discover, prevent or investigate fraud or fulfil our duty to check all transactions against financial sanctions lists before issuing insurance or processing payments under the insurance (Information that we receive from you or a third party).
- **Telephone recordings:** Recordings of telephone calls to our representatives and call centres (Information that we receive from you or a third party).
- **Marketing preferences:** You may let us know your marketing preferences, take part in sales promotions (Information that we receive from you or a third party).

## **2.1 Specific information concerning sensitive data**

We may process sensitive information about you such as data concerning health or union membership. Processing of sensitive personal data require your consent or that we have the right to process the data for establishment, exercising or defence of legal claims. When we use consent as a legal basis, we inform you about this when we ask for your consent. The provision of such data may be conditional for us to be able to provide insurance or manage a claim and, whilst you can withdraw your consent for us to process such data, this may result in us not being able to continue cover, or to process any claims in the same manner as earlier. Processing of sensitive data may be done also after you have withdrawn you consent, but only to the extent that we have the right to process the data for establishment, exercising or defence of legal claims. Sensitive data will only be used for the specific purposes set out in this policy, and will be treated securely and in line with this policy.

## **3. How we use your information**

All data that you supply or we receive from third parties are normally necessary for entering into a contract with us and for us to be able to carry out our obligations towards you under the insurance contract. We may however, also need to process the data for other purposes described below:

Category of personal data	Purpose of processing	Legal basis for processing
<b>General identification and contact information</b>	Calculate insurance premium, offering and accepting insurance cover, offering renewal, informing of changes in the insurance, handling of complaints and appeals	Fulfil our contractual obligations towards you or, at your request, take necessary steps prior to entering into a contract with you; <i>or</i> AmTrust legitimate interests of improving its products, development of its systems and to offer you relevant insurance products.
	Validate/confirm your identity	Fulfil our contractual obligations towards you; <i>or</i> Comply with applicable laws.
	Marketing activities , sending newsletters and offerings	Consent; <i>or</i> AmTrust legitimate interests of marketing its products to you through direct marketing activities ( <i>this applies only on AmTrust Nordic</i> ).
	Answer your questions through the webb, e-mail, mail or phone	Fulfil our contractual obligations towards you.
	Prevent, discover, investigate criminal offenses (including fraud)	Comply with applicable laws.
	Comply with applicable laws and regulatory obligations (including laws outside your country of residence), such as those relating to anti-terrorism and financial sanctions.	Comply with applicable laws.
		<i>If you are the contact for a supplier, partner or policyholder:</i> Administer and perform contracts with suppliers (your employer) or policyholders
<b>Information enabling us to provide products and services</b>	Calculate insurance premium, offering and accepting insurance cover, offering renewal and informing of changes in the insurance	Fulfil our contractual obligations towards you or, at your request, take necessary steps prior to entering into a contract with you; <i>or</i>

		AmTrust legitimate interests of improving its products, development of its systems and to offer you relevant insurance products.
	Perform claims handling.	Fulfil our contractual obligations towards you.
<b>Financial information and account details</b>	Calculate insurance premium, offering and accepting insurance cover and offering renewal and handle payments	Fulfil our contractual obligations towards you.
	Perform claims handling.	Fulfil our contractual obligations towards you.
<b>Sensitive information</b>	Calculate insurance premium, offering and accepting insurance cover, offering renewal and informing of changes in the insurance.	Consent; or The processing is necessary to establish, assert or defend legal claims, for example to establish your right to insurance compensation
	Claims handling	Consent; or The processing is necessary to establish, assert or defend legal claims, for example to establish your right to insurance compensation
<b>Information which is necessary to discover, prevent or investigate fraud or investigations towards financial sanctions lists</b>	Discover, prevent or investigate fraud or investigations towards financial sanctions lists.	Comply with applicable laws
<b>Telephone recordings</b>	Document agreement, quality improvement, educational purposes and security (for example, with respect to recorded or monitored phone calls to our contact numbers) and managing complaints.	Fulfil our contractual obligations towards you or, at your request, take necessary steps prior to entering into a contract with you; <i>or</i>
		AmTrust legitimate interests of improving its products, development of its systems and to offer you relevant insurance products.

<b>Marketing preferences</b>	Marketing activities (including information about other products and services which is offered by us or our business partners) in accordance with your instructions.	Consent; <i>or</i>
		AmTrust legitimate interests of marketing its products, improving its products, development of its systems.

In addition to what is stated above we may process your data if we need the data for establishment, exercising or defence of legal claims.

When calculating applicable insurance premium, offering and issuing insurance cover, validate/confirm your identity, informing you of changes in the insurance and performing claims handling, automated processing may be utilised.

#### **4. Transfer of personal data**

To enable us to provide you with insurance, to manage claims under the insurance and for marketing activities AmTrust may transfer your data to (a) companies within the AmTrust Group, (b) external parties or our businesses partners who are involved in offering products and services to you, (c) our service providers or (d) governmental or other public authorities. These categories include:

- a) **Companies within AmTrust Group** - You will find a list of the companies included in the AmTrust Group at [www.amtrustinternational.com](http://www.amtrustinternational.com). In its capacity as general agent AmTrust Nordic will transfer personal data to the Insurer. The Insurer will also transfer personal data to AmTrust Nordic..
- b) **Distribution partners** – Insurance intermediary and tied agents, brokers, affinity/business partners and other distributors, reinsurers, administrators, financial institutions and other business partners.
- c) **Our service providers** - External service providers, such as business and credit scoring companies, medical professionals, accountants, actuaries; call centre service providers; auditors, experts, lawyers and other outside professional advisors; IT systems, support and hosting service providers; printing, advertising, marketing and market research and analysis service providers; banks and financial institutions; third-party claim administrators; claim investigators and adjusters; and outsourced service providers that assist us in carrying out business activities.
- d) **Governmental or other public authorities** – AmTrust may share personal data with governmental or other public authorities (including, but not limited to supervisory authorities, courts, law enforcement, tax authorities and criminal investigations agencies and to authorities we are obligated to provide information to).

Transfer of personal data will be done to enable us to fulfil our contractual obligations towards you, AmTrust legitimate interest of marketing its products to you (with respect of the Insurer such marketing is only made if you have given your consent), to comply with applicable laws or for establishment, exercising or defence of legal claims. In order to regulate the processing of personal data, AmTrust has made processor contracts with service providers or other companies that are not controllers for their processing.

AmTrust may also disclose your personal information:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If any AmTrust company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- In order to enforce or apply our terms of use set out in the terms of use or terms and conditions page and other agreements; or to protect the rights, property, or safety of AmTrust, our customers, or others.

## 5. International transfer of personal data

For the purposes stated above AmTrust may transfer your personal data to destinations outside the European Economic Area (“**EEA**”). Where we transfer your personal data outside of the EEA, we will ensure that it is treated securely, and in accordance with this privacy policy and applicable law. We only transfer data to countries deemed as having adequate protection by the European Commission or, where there is no adequacy decision, we use the European Commission approved ‘Standard Contractual Clauses’ with such parties to protect the data. A copy of the ‘Standard Contractual Clauses’ can be obtained by writing to the Data Protection Officer at the address given below in Section 10.

## 6. Your rights

You have the following rights with respect of our processing of your personal data:

- (a) **Refuse/change marketing preferences** – You may at any time ask us not to process your data for marketing purposes or change your preferences for marketing.
- (b) **Request copy of personal data we hold about you** – You may request to request access to the personal data that we store about you.
- (c) **Erasure of personal data** – Under certain circumstances, such as when you have revoked you previously given consent and there is no other legal ground available for us to process your personal data, you may request to have your personal data erased. In some cases we may have the right to retain certain personal data despite your request of erasure.
- (d) **Correction** - You have the right to request correction of or erasure of inadequate, incomplete or incorrect personal data.
- (e) **Right to restriction and object to future processing** - You are under certain circumstances entitled to restrict the processing of your personal data to only comprise storage of the personal data, e.g. during the time when AmTrust assesses whether you are entitled to have personal data erased in accordance with (c) above. If the processing of your personal data is based on a balancing of interests and you deem that your integrity interest overrides AmTrust’s legitimate interest to process your personal data, you may also, on grounds related to your particular situation, object to the processing by contacting Controller on the contact details stated below, in which case AmTrust must have a compelling reason in order to continue to process the personal data for the relevant purpose.

- (f) **Right to data portability** - When personal data is processed on the basis of your consent or on the basis that the processing is necessary in order to perform under a contract with you, and provided that the personal data have been provided or generated by you, you are entitled to receive a copy of your personal data in a common machine-readable format.
- (g) **Rights in relation to automated decision-making, including profiling** - You have the right to not be subject to fully automated decision-making, including profiling, if such decision-making has legal effects or similarly significantly affects you. This right does not apply if the decision-making is necessary in order to perform under a contract with you, if the decision-making is permitted under applicable law or if you have provided your explicit consent.
- (h) **Complaints to the supervisory authority** – You are welcome to contact us with any enquiries and complaints that you may have regarding the processing of your personal data. You also have the right to lodge complaints pertaining to the processing of your personal data to the local Data Protection Authority.

### **Exercise your rights**

To exercise your rights stated above please write to the data protection officer at the address stated in section 9 below:

## **7. Retention**

We retain your personal data for as long as a contractual relationship exists or any other undertaking or legal claim may be asserted, and subsequently for maximum ten years after the current year in respect of the limitation rules. When we retain your personal data for other purposes beside fulfilling our contractual obligations towards you, for example fulfilling our legal obligations in respect of bookkeeping and legal or regulatory requirements, we will only retain the data as long as required for each purpose (for example data required for bookkeeping is retained for 7 years). In any case, where data is retained we will endeavour to delete or to anonymise any personal elements, in order to maintain your privacy and security.

## **8. Specifically regarding marketing**

### **Marketing by the Insurer**

Where you have provided consent, we may share personal data that you provide to us within the AmTrust Group of companies and with other companies that we establish commercial links with. They and we may contact you (by mail, e-mail, telephone, text, or other agreed means) in order to tell you about products, services or offers that we believe will be of interest to you, or to provide you with commercial updates. If you do not wish us to continue marketing to you, please let us know.

### **Marketing by AmTrust Nordic**

Unless you have informed AmTrust Nordic otherwise (limited to this company) AmTrust Nordic may process your personal data to market products and services through mail or phone (limited to such

direct marketing activities), all conditioned upon that AmTrust Nordic has a legitimate interest to conduct such marketing.

## **9. Cookies**

AmTrust Nordic uses cookies and other tracking techniques to provide a user friendly webpage and smooth online experience. For information how AmTrust Nordic uses cookies, please see our cookie statement on this webpage

Cookies are small text files consisting of letters and numbers. These are sent from the web servers of AmTrust Nordic or our partners and are stored on your device as shown below. We use different types of cookies:

- Session cookies are temporary cookies that terminate when you close your web browser or app.
- Permanent cookies remain on your computer until you delete them or they expire.
- First-party cookies are set by the website you visit.
- Third-party cookies are set by a third-party site.

The cookies we use usually improve the services we provide you. Some of our services actually need cookies to work, while others simply make our services easier for you to use. In general, we categorise our cookies and their use as follows:

- Essential cookies are absolutely necessary for us to provide our basic services, such as our payment options or our customer portal. Our services would not work without these cookies.
- Analysis cookies provide general analytical information regarding your use of our services. Our services would not work as well without these cookies.
- Function cookies allow us to save settings such as language and determine whether we should pre-fill your details or not. Without these types of cookies, we would be unable to tailor our services according to your wishes. These cookies are essential for our services and for making your experience with us as smooth as possible.
- Security cookies make our services and your data safe and secure by helping us to detect fraud and protect your data. Since this is an essential element in our services, these cookies are necessary.
- Advertising cookies enable us to target relevant marketing to you.

## 10. Contact us

### Contact details for the Insurer

AmTrust International Underwriters DAC, company registration number 169384, 6-8 College Green, Dublin 2, D02 VP48, Ireland.

AmTrust Europe Ltd, company registration number 1229676, 10th Floor Market Square House, St James's Street, Nottingham, NG1 6FG, England.

### Contact details for AmTrust Nordic

AmTrust Nordic AB, company registration number 556671-5677, Hamngatan 11, 111 47 Stockholm, Sweden.

### Data Protection Officer

AmTrust Nordic have appointed a common data protection officer for. If you have any enquiries regarding the processing of your personal data please contact the data protection officer by writing to [dataskyddsbud@amtrustgroup.com](mailto:dataskyddsbud@amtrustgroup.com), or **Dataskyddsbud, AmTrust Nordic AB, Hamngatan 11, 111 47 Stockholm, Sweden.**

If you have any enquiries regarding the processing of your personal data by AmTrust Europe Ltd please contact the data protection officer by writing to **Data Protection Officer, AmTrust International, 5th Floor, Exchequer Court, 33 St Mary Axe, London EC3A 8AA, England**

If you have any enquiries regarding the processing of your personal data by AmTrust International Underwriters DAC please contact the data protection officer by writing to **Data Protection Officer, AmTrust International Underwriters DAC, 6-8 College Green, Dublin 2, D02 VP48, Ireland.**

You may of course also contact the respective company directly with questions concerning data protection on the addresses stated above.

## 11. Changes to this privacy policy

We may revise the privacy policy at any time by amending this page. You are expected to check this page from time to time to take notice of any changes we make.