

# AMTRUST DATA PROTECTION POLICY

## For representatives of, or contact people for, companies or policyholders, and for employees of intermediaries

### 1. Background

AmTrust (as defined below) is dedicated to protecting your privacy. This privacy policy explains how AmTrust collects and uses your personal data when you are named as a contact person for, or employed as an intermediary at/for, (a) a company that has contacted, or has an agreement with AmTrust, or b) policyholders. It also describes your rights towards us and how to exercise them. Unless otherwise stated below, the following information applies for (a) AmTrust International Underwriters DAC (169384) or AmTrust Europe Ltd (1229676) (in the role of applicable “**Insurer**”), (b) AmTrust Nordic AB (556671-5677) (“**AmTrust Nordic**”), (c) AmTrust Insurance Services Sweden AB (556885-4300) (“**AISS**”) and (d) AmTrust Insurance Services Norway AS (917375011) (“**AISSN**”) (collectively “**we**”, “**us**” or “**AmTrust**”).

The data controller for processing your personal data is the AmTrust company that received your personal data from you, the policyholder you represent or are a contact person for, or the employer or company that you are a contact person for or employee of.

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 we collect and what we do with the information

We can collect and process personal data that you give us directly or that we receive via a third party (such as public registers, the company you represent or are a contact person for, or employee of or from policyholders you are a contact person for). Below is a summary of the purpose of our processing, the legal basis for relevant processing and how long we keep your data for.

**2.1 You are a representative of – or contact person for – a company or policyholder that is in contact with or has an agreement with AmTrust**

<p><b>Purpose:</b> To manage and fulfil agreements with, or answer queries from/regarding companies or policyholders where you have been named as a contact person.</p>		
<p><b>Personal data:</b> Contact information such as name, address, telephone number and e-mail address; demographic information about your job title or role for the company or policyholder.</p>		
<b>What we do with the data:</b>	<b>Legal basis:</b>	<b>Retention period</b>
<p>We use your data in your role as contact person so that we can ask or answer queries, sign contracts and fulfil our obligations from and manage the agreement between AmTrust and the company or customer for which/whom you are a contact person.</p>	<p>Balancing of interests – where we judge that our interest in managing and fulfilling agreements with or handling queries to/from the company or customer for which/whom you are a contact person for overrides your interest in protecting your personal data.</p>	<p>Your personal data is stored with us for the period that it may be appropriate to answer or put queries to the company or policyholder you represent/are a contact person for and thereafter, for the period that we may establish claims during the agreement with the company or policyholder you represent or for which/whom you are a contact person.</p>

<p><b>Purpose:</b> If you are a representative of a legal entity with whom AmTrust has entered into an agreement or intends to enter into an agreement, we may need to process your personal data in order to carry out customer due diligence checks, sanction screening or similar.</p>		
<p><b>Personal data:</b> Contact information such as name, address, telephone number and e-mail address; demographic information such as date of birth and gender, work and job title; CV; personal identity number for identification; identification documents.</p>		
<b>What we do with the data:</b>	<b>Legal basis:</b>	<b>Retention period</b>
<p>We use your data to fulfil legal obligations. This means, for example, documentation requirements regarding suitability and the fulfilment of expertise requirements.</p>	<p>The processing is necessary so as to fulfil a legal obligation of AmTrust.</p>	<p>Your personal data is stored with us for as long as necessary in order to fulfil the legal obligation.</p>

## 2.2 You are the contact person for or employee of an intermediary

<p><b>Purpose:</b> To manage and fulfil agreements regarding the arranging of insurance.</p>		
<p><b>Personal data:</b> Contact information such as name, address, telephone number and e-mail address; demographic information such as date of birth and gender, your work and job title, as well as personal identity number when required to identify you.</p>		
<p><b>What we do with the data:</b></p>	<p><b>Legal basis:</b></p>	<p><b>Retention period</b></p>
<p>We use your personal data to manage and fulfil our obligations in accordance with the agreement we have with your employer or the customer you represent in your capacity as an intermediary (e.g. to calculate commission and follow up insurance policies taken out).</p>	<p>Balancing of interests, where we judge that our interest in managing and fulfilling agreements with our intermediaries or customers overrides your interest in protecting your personal data.</p>	<p>Your personal data is stored with us for the period during which we have an agreement with your employer or the customer you represent or for whom are a contact person.</p>

<p><b>Purpose:</b> If your employer is an insurance intermediary/or will become an intermediary or ancillary intermediary appointed by AmTrust – to fulfil legal obligations and legal and official requirements.</p>		
<p><b>Personal data:</b> Contact information such as name, address, telephone number and e-mail address; demographic information such as date of birth and gender, your work and job title; personal identity number for identification; identification documents, documents that show good repute and conscientiousness in financial affair as well as notification that extracts from criminal records have been shown (no copies of extracts or other data is saved or processed).</p>		
<p><b>What we do with the data:</b></p>	<p><b>Legal basis:</b></p>	<p><b>Retention period</b></p>
<p>We use your data to fulfil legal obligations. This means, for example, documentation requirements regarding suitability and the fulfilment of expertise requirements.</p>	<p>The processing is necessary so as to fulfil a legal obligation of AmTrust.</p>	<p>Your personal data is stored with us for as long as necessary in order to fulfil the legal obligation regarding documentation for related intermediaries. This typically mean that AmTrust need to retain the personal data for a period of three years after the agreement with the insurance intermediary has ended.</p>

## 3. Transfer of personal data

Processors who process personal data on behalf of AmTrust: In cases where it is necessary for us to be able to offer our services, we share your personal data with companies that are so-called

data processors. A data processor is a company that processes the data on our behalf and according to our instructions. We have data processors who help us with:

- 1) Transport (logistics companies and freight forwarders).
- 2) Payment solutions (card redemption companies, banks and other payment service providers).
- 3) Marketing (print and distribution, digital media, media agencies or advertising agencies).
- 4) IT Services (companies that handle the necessary operation, technical support, maintenance of our IT solutions and other IT services and solutions) and
- 5) Security services (e.g security companies or sanctions screening providers)
- 6) Outsourced service providers (e.g. third-party claim administrators; claim investigators and adjusters or an outsourced service providers that assist us in carrying out business activities).

When your personal data is shared with our data processors, it is only for purposes that are consistent with the purposes for which we have collected the information (e.g. to fulfil a legal obligation of AmTrust and be able to fulfill our commitments under the agreement with your employer or the person that you represent). AmTrust has entered into a data processing agreement with each data processor through which the data processors guarantee the security of the personal data processed and undertake to comply with AmTrust's security requirements as well as restrictions and requirements regarding international transfer of personal data.

To data controllers: AmTrust also share your personal information with companies that are data controllers. A company who are a data controller determines the purposes and means of its own processing of personal data. AmTrust do not control how the information is processed or handled by other data controllers. AmTrust share personal data to other controllers in order for, for example, provide insurance, handle damages for policyholders you represent, manage our agreement with your employer or the policyholder you represent/for which you are a contact person. AmTrust may transfer or share your personal data with the following categories of data controllers:

- 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. In its capacity as a distributor of insurance policies and a claims adjuster, AISS and AISN will also provide personal data to the Insurer and its general agent AmTrust Nordic AB.
- b) **Transport provider**(logistics companies and freight forwarders).
- c) **Payment solutions** (card redemption companies, banks and other payment service providers).
- d) **Other insurance providers** (in some cases AmTrust may need to share your personal data with other insurance providers to regulate e.g. a recourse upon a claim)
- e) **Governmental or other public authorities** – AmTrust may share personal data with governmental or other public authorities when we are legally obligated to do so (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).

Transfers of personal data to data controllers are supported by a balancing of interests, where we judge that our interest in managing and fulfilling agreements with your employer or the policyholder

you represent overrides your interest in protecting your personal data or due to legal obligations or to enable AmTrust to determine, establish or defend legal claims.

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.

#### **4. 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 provided below in section 6.

#### **5. 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.

To exercise your rights in accordance with the above, please write to the data protection officer at the address provided below in section 6.

## **6. 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, Linnégatan 14, 114 47 Stockholm, Sweden.

### Contact details for AISS

AmTrust Insurance Services Sweden AB, company registration number 556885-4300, Hesselmans Torg 5, 131 54 Nacka, Sweden.

### Contact details for AISN

AmTrust Insurance Services Norway AS, company registration number 917 375 011, Haakon VII's gate 6, 0161 Oslo, Norway.

#### Data Protection Officer

AmTrust Nordic, AISS and AISN have appointed a common data protection officer for. If you have any enquiries regarding the processing of your personal data by these named companies please contact the data protection officer by writing to [dpo.nordic@amtrustgroup.com](mailto:dpo.nordic@amtrustgroup.com), eller **Dataskyddsbud, AmTrust Nordic, Linnégatan 14, 114 47 Stockholm, Sweden.**

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

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, Irland.**

Needless to say, you are also welcome to contact each company directly regarding data protection issues at the respective address above. If you are unsure which company to contact, we are happy to help guide you or contact the relevant AmTrust company for you.

#### **7. Amendments to this privacy policy for suppliers, contact people or intermediaries**

We may revise the privacy policy at any time by amending this page. In case of significant changes we will inform you.

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