

PRIVACY NOTICE

Gefion Insurance A/S ("Gefion") strives to protect the privacy and the confidentiality of Personal Data that the company processes in connection with the provision of our services.

We provide agents and brokers with non-life insurance solutions to allow them to provide insurance policies on our behalf, including access to and administration of insurance claims.

To arrange insurance cover and handle insurance claims, we are required to use and share Personal Data with other insurance market participants such as re insurers, coverholders, agents and brokers.

During the insurance lifecycle we will receive Personal Data relating to potential or actual policyholders, beneficiaries under a policy, their family members, claimants and other parties involved in a claim. Therefore, references to "individuals" in this notice include any person, whose Personal Data we receive in connection with the services we provide. This notice sets out our use of this Personal Data and the disclosures we make to other insurance market participants and other third parties.

IDENTITY OF CONTROLLER AND CONTACT DETAILS

Gefion Insurance A/S, Østergade 10, 3, 1100 Copenhagen K, Denmark, is the controller in respect of the Personal Data we receive in connection with the services provided under the relevant engagement with other insurance market participants.

PERSONAL INFORMATION THAT WE PROCESS

We may collect and process the following Personal Data:

- Individual details, including name, address, other contact details (e.g. email and telephone details), gender, marital status, family details, date and place of birth, employer, job title and employment history, relationship to the policyholder, insured, beneficiary or claimant;
- Identification details, including identification numbers issued by government bodies or agencies (e.g. social security or national insurance number, passport number, ID number, tax identification number, driver's license number);
- Financial information, including bank account number and account details, income and other financial information;
- Information about the insured risk, which may contain Personal Data;
- Health data, including current or former physical or mental medical conditions, health status, injury or disability information, medical procedures performed, relevant personal habits (e.g. smoking or consumption of alcohol), prescription information, medical history;
- Criminal records data, including criminal convictions;
- Other special categories of Personal Data such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning an individual's sex life or sexual orientation;
- Policy information, information about the quotes individuals receive and the policies they obtain;
- Credit and anti-fraud data, credit history and credit score, information about fraud convictions, allegations of crimes and sanctions details received from various anti-fraud and sanctions databases, or regulators or law enforcement agencies;
- Previous claims, information about previous claims, which may include health data, criminal records data and other Special Categories of Personal Data (as described above);
- Current claims, information about current claims, which may include health data, criminal records data and other Special Categories of Personal Data (as described above).
- Website and communication usage, details of your visits to our websites and information collected through cookies and other tracking technologies, including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data, location data, web logs and other communication data, and the resources that you access.

Where we collect such information directly from individuals, we will inform them of whether the information is required and the consequences of not providing it on the relevant form.

SOURCES OF PERSONAL DATA

We collect and receive Personal Data from other insurance market participants (such as agents, brokers, reinsurers, and third-party claims handlers). Forms on our website and your interactions with our website. Any privacy relevant cookie information is displayed on our website.

HOW WE USE AND DISCLOSE YOUR PERSONAL DATA

In this section, we set out the purposes for which we use Personal Data, explain how we share the information, and identify the “legal grounds” on which we rely to process the information. These “legal grounds” are set out in the General Data Protection Regulation (GDPR), which allows companies to process Personal Data only when the processing is permitted by the specific “legal grounds” set out in the GDPR. Please note that in addition to the disclosures identified in the table appendix we may disclose Personal Data for the purposes we explain in this notice to service providers, contractors, advisers, agents and companies that perform activities on our behalf.

CONSENT

In order to facilitate the provision of insurance cover and administer insurance claims, unless another legal ground applies, we rely on the data subject’s consent to process special categories of Personal Data such as medical and criminal convictions records, as set out in the table appendix.

This consent allows us to share the information with other insurers, reinsurers and claims handlers that need to process the information in order to undertake their role in the insurance market.

The affected individual’s consent to this processing of special categories of Personal Data may be necessary for Gefion to be able to provide our services.

Individuals may withdraw their consent to such processing at any time by contacting Gefion using the contact details provided as part hereof. However, doing so may prevent Gefion from continuing to provide our services or to process their claim. In addition, if an individual withdraws consent to the processing of their convictions or special categories of Personal Data, it may not be possible for the insurance cover to continue.

SECURITY

We have in place physical, electronic, and procedural safeguards appropriate to the sensitivity of the information we maintain. These safeguards will vary depending on the

sensitivity, format, location, amount, distribution and storage of the Personal Data, and include measures designed to keep Personal Data protected from unauthorized access. If appropriate, the safeguards include encryption of information, firewalls, access controls, and similar security protocols. We restrict access to Personal Data to personnel and third parties that require access to such information for legitimate, relevant business purposes.

LIMITING COLLECTION AND RETENTION OF PERSONAL INFORMATION

We collect, use, disclose and otherwise process Personal Data that is necessary for the purposes identified in this Privacy Notice or as permitted by law. If we require Personal Data for a purpose inconsistent with the purposes we identified in this Privacy Notice, we will notify individuals of the new purpose and, where required, seek individuals’ consent (or ask other parties to do so on our behalf) to process Personal Data for the new purposes.

Our retention periods for Personal Data are based on business needs and legal requirements. We retain Personal Data for as long as is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purpose. For example, we retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data. When Personal Data is no longer needed, we either irreversibly anonymise the data (in which case we may further retain and use the anonymised information) or securely destroy the data. Individuals may request additional information about the specific safeguards applied to their Personal Data.

CROSS-BORDER TRANSFER OF PERSONAL INFORMATION

Gefion may transfer Personal Data to, or permit access to Personal Data from, countries outside the European Economic Area (EEA). Where these countries’ data protection laws do not meet the EU Adequacy Criteria we will, in all circumstances, safeguard Personal Data by the use of model clauses in contracts or safeguards such as the EU – US/Swiss Privacy Shield.

Individuals can request additional information about the specific safeguards applied to the export of their Personal Data.

ACCURACY, ACCOUNTABILITY, OPENNESS AND YOUR RIGHTS

We strive to maintain Personal Data that is accurate, complete and current. Individuals should contact us at dpo@gefioninsurance.com to update their information.

Under certain conditions, individuals have the right to request Gefion (i) provide further details on how we use and process their Personal Data; (ii) provide a copy of the Personal Data we maintain about the individual; (iii) update any inaccuracies in the Personal Data we hold; (iv) delete Personal Data that we no longer have a legal ground to process; and (v) restrict how we process the Personal Data while we consider the individual’s enquiry.

In addition, under certain conditions, individuals have the right to: (i) where processing is based on consent, withdraw the consent; (ii) object to any processing of Personal Data that Gefion justifies on the “legitimate interests” legal grounds, unless our reasons for undertaking that processing outweigh any prejudice to the individual’s privacy rights;

and (iii) object to direct marketing (including any profiling for such purposes) at any time.

These rights are subject to certain exemptions to safeguard the public interest (e.g., the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege). We will respond to most requests within 30 calendar days. We will always try to resolve an enquiry or a complaint, but in any case, individuals have the right to complain to the Danish Data Protection Agency who are our supervisory authority.

CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice is subject to change at any time. If we make changes to this Privacy Notice, we will update the date it was last changed. Where we have an engagement with you, we will notify you of any changes we make to this Privacy Notice in accordance with the notice provisions in the terms of our engagement. In other circumstances, we will publish the revised Privacy Notice on our website.

Purpose of Processing	Legal grounds	Disclosures
Policy Administration		
General policy administration, including communicating with clients	<ul style="list-style-type: none"> • Performance of our contract with individuals (policyholders) • Legitimate interests of Gefion (to correspond with other parties in order to facilitate the processing and administration of insurance policies) • For processing special categories of Personal Data (e.g. health information) and criminal records data: • Consent OR • Substantial public interest • To establish, defend or prosecute legal claims 	Insurance Market Participants

Purpose of Processing	Legal grounds	Disclosures
Claims processing		
Managing insurance policies and claims	<ul style="list-style-type: none"> • Performance of our contract with individuals (policyholders) • Legitimate interests (to manage policies and claims) • For processing special categories of Personal Data (e.g. health information) and criminal records data: • Consent OR • Substantial public interest • To establish, defend or prosecute legal claims 	<ul style="list-style-type: none"> • Insurance Market Participants • Claims handlers • Lawyers • Loss adjusters • Experts • Third parties involved in handling or otherwise addressing the claim, such as health care professionals

Purpose of Processing	Legal grounds	Disclosures
Defending or prosecuting legal claims	<ul style="list-style-type: none"> • Performance of our contract with individuals (policyholders) • Legitimate interests (in defence or prosecution of legal claims) • For processing special categories of Personal Data (e.g. health information) and criminal records data: • To establish, defend or prosecute legal claims 	<ul style="list-style-type: none"> • Insurance Market Participants • Claims handlers • Lawyers • Loss adjusters • Experts • Third parties involved in handling or otherwise addressing the claim, such as health care professionals
Investigating and prosecuting fraud	<ul style="list-style-type: none"> • Performance of our contract with individuals (policyholders) • Legitimate interests (to assist with the prevention and detection of fraud) • For processing special categories of Personal Data (e.g. health information) and criminal records data: • To establish, defend or prosecute legal claims • Substantial public interest OR Consent 	<ul style="list-style-type: none"> • Insurance Market Participants • Lawyers • Police • Experts • Other insurers • Anti-fraud databases • Third parties involved in the investigation or prosecution, such as private investigators

Purpose of Processing	Legal grounds	Disclosures
Throughout the insurance lifecycle		
Transferring books of business	<ul style="list-style-type: none"> • Legitimate interests (to structure our business appropriately) • For processing special categories of Personal Data (e.g. health information) and criminal records data: • Consent 	<ul style="list-style-type: none"> • Group companies • Courts • Purchaser (potential and actual)
Complying with our legal or regulatory obligations	<ul style="list-style-type: none"> • Compliance with legal obligations • Legitimate interests (to take pre-emptive steps to ensure legal and regulatory compliance) • For processing special categories of Personal Data (e.g. health information) and criminal records data: • To establish, defend or prosecute legal claims • Substantial Public Interest • OR Consent 	<ul style="list-style-type: none"> • Insurance Market Participants, data protection and other regulators • Police • Insurers • Auditors

Purpose of Processing	Legal grounds	Disclosures
Email and Website activities		
To communicate with you regarding any queries you raise via the website or email	<ul style="list-style-type: none"> • Legitimate interests 	Nil
When required (i.e. other than first party system cookies) to ensure the website content is relevant and presented in the most effective manner for you and your device	<ul style="list-style-type: none"> • Consent 	