

PRIVACY NOTICE FOR BUSINESS CLIENTS

- 1.1 **PERSONAL DATA PROCESSING.** STONEFORT CAPTIVE MANAGEMENT S.A. (**COMPANY**) collects and processes personal data on you, as a legal representative/director, and the controlling persons of the company having a business relationship with. 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:
- for purposes of usual business client management (including cash transaction, credit and debit, for commissions, premiums, claims, etc.),	- for the performance of a contract with you, to comply with legal obligations to which the COMPANY is subject and for purposes of legitimate interests pursued by the COMPANY.
- for risk management, compliance and due diligence purposes, for on-boarding ongoing monitoring, (including AML or background checks where relevant), and	
- for accounting tasks and legal documentation.	

- 1.4 **DATA CATEGORIES.** The COMPANY may collect from you and process the following categories of personal data for a legal representative and/or directors of the business client: personal identification data (name, surname, nationality, birthdate), public identification data (passport data, ID card), professional information (job title), legal data: search and due diligence (such as: search results, matching against public lists, internet and other sources such as CDDS, Factiva, Bloomberg), public office (PEP status - sensitive data processed as purpose is not to reveal your political orientations but the existence of public office holders).
- 1.5 **DATA RECIPIENTS.** The COMPANY may share your data with other entities of the COMPANY group, third-party partners/providers (including auditors, advisors, consultants, lawyers) and, where required by law, to 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:
- be limited to what is necessary to perform the contract with you, or conclude a contract with a third-party in your interest, or
 - be justified by the establishment, exercise or defence of legal claims, or
 - if appropriate, be covered by appropriate safeguards, such as entering into EC approved standard contractual clauses.
- 1.7 **DATA RETENTION.** The COMPANY will retain your personal data for as long as required by applicable law (typically 10 years after contract termination and according to ID card/passport validity).

- 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].
- 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].
 - 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.