SIRIUSPOINT INTERNATIONAL INSURANCE CORPORATION (SINT)
AND
SIRIUS INTERNATIONAL MANAGING AGENCY (SIMA)
PRIVACY NOTICE

8 October 2021

In this notice **we** are informing **you** about the processing of your **personal data** that we may have received from **you** or others. **We** are also informing **you** about the rights **you** have under data privacy law.

We, **us** or **our** refers to **SiriusPoint International Insurance Corporation and Sirius International Managing Agency**.

You or **your**, refers to the individual whose **personal data** may be processed by **us** (**you** may be the insured, beneficiary, claimant or other person involved in a claim or relevant to a policy).

There are other terms in **bold** with specific meanings. Those meanings can be found in the Glossary below.

1 Responsible Data Controller

SiriusPoint International Insurance Corporation (SINT) and Sirius International Managing Agency (SIMA) is responsible for the processing of your **personal data**.

For contact details to **us** and our Data Protections Officers, please see below under Contact details.

2 The data we may collect about you (your personal data)

In order for **us** to provide insurance quotes, insurance policies, reinsurance, arrange reinsurance and/or deal with any claims or complaints, **we may** need to collect and process **personal data** about **you**. The types of **personal data** that are processed may include:

Types of Personal Data	Details
Individual details	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to **you**
Identification details	Identification numbers issued by government bodies or agencies, including **your** national insurance number, passport number, tax identification number and driving license number
Financial	Bank account or payment card details, income or other financial information
Risk details	Information about **you** which **we** need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to **your** health, or other **special categories of personal data.** For certain types of policy, this could also include **telematics data**.
Policy information	Information about the quotes **you** receive and policies **you** take out
Previous and current claims	Information about previous and current claims, (including other unrelated insurances),which may include data relating to **your** health, or other **special categories of personal data**
Special categories of personal data	Certain categories of **personal data** which have additional protection under the **GDPR** (often referred to as sensitive personal data).The sensitive **personal data we** may process about **you** mainly relates to health if relevant to the type of insurance **you** have with us.

3 Where we may collect your personal data from

We may collect your personal data from various sources, for instance
- **you**;
- **your** family members, employer or representative;
- other **insurance market participants**;
- third-party providers in conformity with legal provisions;
- in the event of a claim, third parties including the other party to the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers
- publicly accessibly sources

4. The purposes, legal grounds and recipients, of our processing of your personal data

We process your personal data in accordance with the European General Data Protection Regulation (GDPR") and other relevant data protection laws.

We set out below:

- The purposes **we** might use **your personal data** for.
- The legal grounds for processing that **personal data**. Those legal grounds are set out in the **GDPR** and applicable national data protection legislation.
- What **personal data we** might provide to third parties (disclosures).

4.1 Purposes

Quotation/Inception:
- Setting **you** up as a client
- Evaluating the risks to be covered and matching to appropriate policy/ premium
- Payment of premium where the insured/policyholder is an individual
- Policy administration:
- Client care, including communicating with **you** and sending **you** updates
- Payments to and from individuals

Claims Processing:
- Managing insurance and reinsurance claims
- Defending or prosecuting legal claims
- Investigation or prosecuting fraud

Renewals:
- Contacting the insured/policyholder to renew the insurance policy
- Evaluating the risks to be covered and matching to appropriate policy/ premium
- Payment of premium where the insured/policyholder is an individual

Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the insurance lifecycle period:
- Complying with **our** legal or regulatory obligations
- General risk modelling
- Transferring books of business, company sales and reorganisations

4.2 Legal Grounds

We are only permitted to process **your personal data** where **we** have legal grounds to do so.

To the extent that **personal data** is processed in the context of the processes stated below, the main legal grounds **we** will rely on are:

Inwards Underwriting:

Insurance contracts with private individuals (only in UK)		
Personal data	*Policyholder (contract party):* Performance of contract	*Other individuals (other insured, beneficiaries, claimants, witnesses):* Legitimate interest in understanding covered parties and assessing the risk
Sensitive personal data	Substantial public interest	

Reinsurance contracts	
Personal data	Legitimate interest in understanding covered parties and assessing the risk and claims, Performance of contract
Sensitive personal data	Substantial public interest or explicit consent as applicable

Outwards Underwriting:

Reinsurance contracts	
Personal data	Legitimate interest in understanding covered parties and assessing the risk and claims
Sensitive personal data	Substantial public interest or explicit consent as applicable

Claims Process:

Claims settlement of all types of claims		
Personal data	*Individual that is a Policyholder (contract party):* Performance of contract	*Other individuals (e.g. other insured, beneficiaries, claimants, witnesses):* Legitimate interest
Sensitive personal data	Substantial public interest, legal claims or explicit consent as applicable	

In addition to this, we process your personal data in order to fulfil legal requirements such as supervisory standards and retention obligations under commercial and tax law.

4.3 Third parties we may disclose personal data to

We may disclose **your personal data** to third parties. These can include:

- Group companies providing administration
- Banks
- Claims handlers
- Solicitors
- Loss adjustors
- Experts
- Third parties involved in the claim
- Other insurers and reinsurers
- SFSA, PRA, FCA, ICO and other regulators

W**e** may also disclose **personal data** for the purposes listed above to **our** service providers, contractors, agents and group companies that perform activities on **our** behalf.

We do not disclose the information to anyone else except:

- where **we** have **your** permission.
- where required or permitted to do so by law.
- to other companies that provide a service to **you** or **us**.

5 Consent

In order to provide insurance cover and deal with insurance claims in certain circumstances **we** may need to process **your special categories of personal data**, such as medical records, as set out against the relevant purpose.

Your consent to this processing may be necessary for us and other insurance market participants to achieve this.

To the extent that you have provided your consent to the processing, you may withdraw your consent to such processing at any time. However, if you withdraw your consent this will impact our ability to provide insurance or pay claims.

6 Profiling and automatic decision making

When calculating insurance premiums **we** may compare **your personal data** against industry averages. **Your** anonymised data may also be used to create the industry averages going forward. This is known as profiling and is used to ensure premiums reflect risk. Data will not be used to identify you, and is intended to help us better understand and price the risk. We do not sell your data or use profiling to sell you products unrelated to the insurance cover you are seeking.

We might make some decisions based on profiling and without staff intervention (known as automatic decision making).

7 Retention of your personal data

We will keep **your personal data** only for so long as is necessary and for the purpose for which it was originally collected. In particular, for so long as there is any possibility that either **you** or **we** may wish to bring a legal claim under this insurance, or where **we** are required to keep **your personal data** due to legal or regulatory reasons.

8 International transfers

We may need to transfer **your** data to other **insurance market participants** or their affiliates or subcontractors which are located outside of the European Economic Area (EEA). Those transfers would always be made in compliance with the **GDPR**.

If **you** would like further details of how **your personal data** would be protected if transferred outside the EEA, please contact **our** Data Protection Officer – See section 12 for contact details.

9 Your rights

If **you** have any questions in relation to **our** use of **your personal data**, **you** should first contact **our** Data Protection Officer – See section 12 for details. Under certain conditions, **you** may have the right to require **us** to:

- provide **you** with further details on the use **we** make of **your personal data**;
- provide **you** with a copy of the **personal data** that **you** have provided to **us**;
- update any inaccuracies in the **personal data we** hold;
- delete any **personal data** that **we** no longer have a lawful ground to use;
- where processing is based on consent, to withdraw **your** consent so that **we** stop that particular processing;
- object to any processing based on the legitimate interests ground unless **our** reasons for undertaking that processing outweigh any prejudice to **your** data protection rights; and
- restrict how **we** use **your personal data** whilst a complaint is being investigated.

10 Your right to complain to a supervisory authority

If **you** are not satisfied with **our** use of **your personal data** or **our** response to any request by **you** to exercise any of **your** rights stated above, or if **yo**u think that **we** have breached the **GDPR**, then **you** have the right to complain to a local Data Protection supervisory authority, e.g. in the EU Member State of your habitual residence, place of work or place of the alleged infringement.

Below are contact details to the supervisory authorities in Sweden and the UK, where SINT has its main establishments.

UK - the Information Commissioners Office (ICO), [www.ico.org.uk/concerns,](http://www.ico.org.uk/concerns) telephone 0303 123 1113 or +44 1625 545 700 if you are calling from outside the UK.

Sweden – Integritetsskyddsmyndigheten, https://www.imy.se/ telephone +46(0) 657 61 00

11 Glossary

Key insurance terms:

Beneficiary is an individual or a company that an insurance policy states may receive a payment under the insurance policy if an insured event occurs. A beneficiary does not have to be the **insured/policyholder** and there may be more than one beneficiary under an **insurance policy**

Claimant is either a **beneficiary** who is making a claim under an **insurance policy** or an individual or a company who is making a claim against a **beneficiary** where that claim is covered by the **insurance policy**

Claims processing is the process of handling a claim that is made under an insurance policy

Quotation is the process of providing a quote to a potential **insured/policyholder** for an **insurance policy**

Inception is when the **insurance policy** starts

Insurance is the pooling and transfer of risk in order to provide financial protection against a possible eventuality. There are many types of insurance. The expression **insurance** may also mean **reinsurance**

Insurance policy is a contract of insurance between the **insurer** and the **insured**/**policyholder** *Insurance market participant(s) or participants:* is an **intermediary**, **insurer** or **reinsurer**

Insured/policyholder is the individual or company in whose name the **insurance policy** is issued. A potential insured/policyholder may approach an **intermediary** to purchase an **insurance policy** or they may approach an **insurer** directly or via a price comparison website.

Insurers: (sometimes also called underwriters) provide insurance cover to **insured/policyholders** in return for **premium.** An **insurer** may also be a **reinsurer.**

Intermediaries help **policyholders** and **insurers** arrange insurance cover. They may offer advice and handle claims. Many insurance and reinsurance policies are obtained through **intermediaries**

Policy administration is the process of administering and managing an **insurance policy** following its **inception**

Premium is the amount of money to be paid by the **insured/policyholder** to the **insurer** in the **insurance policy**

Reinsurers provide insurance cover to another **insurer** or **reinsurer**. That insurance is known as reinsurance

Renewal is the process of the **insurer** under an **insurance policy** providing a **quotation** to the **insured/policyholder** for a new **insurance policy** to replace the existing one on its expiry

Key data protection terms:

Personal Data means any information relating to a living natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special categories of Personal Data (also known as **Sensitive personal data**) means **personal data** revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

GDPR: is the EU General Data Protection Regulation and any supplemental national

law. *We, us* or *our* refers to SINT/ SIMA.

You or *your* refers to the individual whose **personal data** may be processed by **us**. **You** may be the insured, beneficiary, claimant or other person involved in a claim or relevant to an **insurance policy**

12 Contact details

Data Protection Officer
SiriusPoint International Insurance Corporation
Visiting address: Birger Jarlsgatan 57B
SE-113 96 Stockholm
Sweden
Telephone: +46 (0)8 458 5500 (Switchboard)
E-mail: DPOSirius@siriuspt.com

Data Protection Officer
Sirius International Managing Agency Limited
Floor 4, 20 Fenchurch Street
London
EC3M 3BY
Telephone: +44 (0)203 772 1000 (Switchboard)
E-mail: DPOLondon@siriuspt.com

13 Identities of data controllers and data protection contacts

The **insurance lifecycle** involves the sharing of **your personal data** between **insurance market participants**, some of which **you** will not have direct contact with. In addition, **your personal data** may not have been collected directly by an **insurance market participant**.

You can find out the identity of the initial **data controller** of **your personal data** within the insurance market life-cycle in the following ways:

- *Where you took out the insurance policy yourself:* the **insurer** and, if purchased through an **intermediary**, the **intermediary** will be the initial **data controller** and their **data protection contact** can advise **you** on the identities of other **insurance market participants** that they have passed **your personal data** to.
- *Where your employer or another organisation took out the policy for your benefit:* **you** should contact **your** employer or the organisation that took out the policy who should provide **you** with details of the **insurer** or **intermediary** that they provided **your personal data** to and **you** should contact their **data protection contact** who can advise **you** on the identities of other **insurance market participants** that they have passed **your personal data** to
- *Where you are not a policyholder or an insured:* **you** should contact the organisation that collected **your personal data** who should provide **you** with details of the relevant **participant's data protection contact**.