



NORDICA LIFE (Bermuda) Ltd.

Privacy Notice

As per January 2025

This privacy notice explains how Nordica Life (Bermuda) Ltd., as data controller, collects and deals with personal data.

What personal data do we collect?

We will collect and process personal data given to us by phone, e-mail and filling in forms. We may also collect information from intermediaries or financial advisers in order to issue an insurance policy and any related services that have been requested. We may collect personal data for verification purposes, from other sources such as electronic verification service providers and information which individuals volunteered to be in the public domain and other industry-wide sources.

For corporate owned policies we may also collect personal data from the employers or the corporate policyholder.

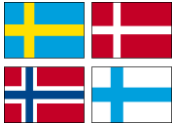
The type of personal data we will collect includes: basic personal data such as name, address, email address, telephone number, date and place of birth, gender, marital status, nationality, country of residence, and photographic identification which include national identity number; employment and financial details; and where other individuals are to be included in the arrangement, personal data about those individuals. Where required, we may also collect sensitive information such as medical and health details to allow us to underwrite any insurance cover and augment claims information, including details of any incident giving rise to a claim, as well as financial, medical and health information relevant to the claim.

Nordica Life protects each individual's privacy by:

- only collecting information that we need to provide our services
- explaining why we are collecting personal data and how we will be using it
- using personal data only for our business operations and to comply with the law
- ensuring the personal data we collect and hold, is accurate
- holding personal data only for so long as necessary and keeping it secure
- sharing personal data only with companies and organisations that will keep it secure
- not sending personal data abroad without ensuring its security
- ensuring that all individual rights can be exercised

How do we use personal data?

We will collect and use personal data where the processing is necessary in connection with providing a quotation and/or insurance contract that have been requested; and to meet our legal or regulatory obligations.



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A list of examples of our purposes for which we will collect and use personal data are:

- to provide a quotation and/or insurance contract
- to identify individuals that contact us
- to administer and renew policies
- to communicate with policyholders or their appointed representatives
- to make and receive payments
- to assess, process and settle claims
- for fraud prevention and detection purposes
- to comply with applicable legal and regulatory requirements such as anti-money laundering, financial sanctions, tax reporting obligations such as Common Reporting Standards (CRS) and Foreign Account Tax Compliance Act (FATCA) or other regulatory reporting. This includes complying with requests to provide data including personal data to our regulators, which may be on an ad hoc or regular basis, such as with the Bermuda Monetary Authority. Such data sharing may include personal data of relevant parties such as policyholders, claimants, lives assured, beneficiaries and controlling persons of company owned schemes. This data sharing may include requests for historic as well as current data.
- personal data, such as age, gender and additional health information will be used to evaluate the level of risk associated with providing the insurance policy. This process may influence whether or not we provide the product, the price of the premium, or the terms upon which we can offer the product.

We ensure to keep the amount of information collected for legitimate interest purposes and the extent of any use to the absolute minimum.

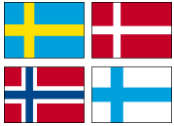
Who do we share personal data with?

Where necessary, we will share the personal data provided to us for the purposes of providing insurance products and any related services requested with the types of recipients described below:

- the intermediary or financial adviser involved incl. the custodian bank linked to the policy (product dependent)
- the policyholder or it's representative in case of a corporate owned insurance
- reinsurers and auditors
- suppliers that provide relevant services such as policy administration, electronic identity verification and underwriting assessment
- healthcare professionals, for example doctors, hospitals and clinics (if you have consented to the healthcare professional's disclosure of data)

In order to meet our legal or regulatory requirements, we also share personal data with the following types of recipients:

- regulatory and legal bodies, including requests made by our regulators for supervisory purposes, where we must share data whether on an ad hoc or regular basis
- government or tax authorities
- law enforcement bodies following a court decision



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The personal data provided will only be available to those people with a legitimate need to see it. For example, only those people involved in the management of risk in connection with underwriting and claims, will be able to see the sensitive information gathered about your health and only for that purpose.

How do we transfer personal data to other countries?

Given the global nature of our business, we may transfer personal data to other countries. Where we transfer personal data to countries that are outside of Bermuda and the European Union (EU) we will ensure that the personal data is given adequate safeguards and that the transfer is lawful.

For how long do we keep personal data?

We will retain and process personal data only for as long as it is needed for the purpose for which the data was processed.

As a general rule we store personal data for as long as we are providing a service or a product. When a client relationship with us has ended, we store personal data for another twelve years for regulatory requirements, e.g. the obligation to provide exchange of information upon request.

What happens if we do not receive the required personal data?

If we do not receive the required personal data, we will not be able to establish an insurance contract, policy coverage or assess future claims.

What data protection rights do individuals have?

All individuals have the following rights under data protection laws, namely:

- to request access their personal data
- to have personal data rectified if it is inaccurate or incomplete
- in certain circumstances, to have personal data deleted or removed
- in certain circumstances, to restrict the processing of personal data
- to object to the processing of personal data
- to claim compensation for financial loss or emotional distress for failure to comply with the data protection legislation

If we are processing personal data with consent, consent may be withdrawn at any time (the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal).

These rights may be exercised by contacting our Data Protection Officer. In order to protect privacy, individuals will be asked to provide suitable proof of identification before we can process rights-related requests.



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Our commitment

- We keep personal data safe through a multilayered security approach that includes encryption, regular security audits, employee training and managed access controls. We continuously monitor for threats and operate in line with relevant regulations.
- We don't sell, rent out or provide our customers' data to third parties without consent or beyond the services we agreed to deliver. We use personal data to help improve our products and services and to comply with legal requirements.
- We are transparent about how we process personal data, and we have contracts in place for third party data processors. We delete personal data in accordance with the defined retention period unless required differently by law.

Data Protection Contact

If you have any questions about the use of personal data, you can contact our Data Protection Officer by e-mail to DPO@nordicalife.com.

In case you are not satisfied with how we process your personal data and your contact with our Data Protection Officer has not led to a satisfactory outcome, you can make a complaint to the Office of the Privacy Commissioner for Bermuda.