

Sampo Group

Data Privacy Statement

Approved by Sampo plc's Board of Directors on May 9, 2018



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1. Introduction

1.1 Aim and Scope of the Group Level Statement

The aim of this Data Privacy Statement is to ensure the adequate level of protection of personal data and the compliance with the applicable laws by Sampo Group companies. The Statement encompasses the processing of personal data - not all data as such. It explains how personal data are processed in relation to the Group's business activities and applies to all companies of Sampo Group together with their employees.

Sampo Group companies operate in the financial and insurance sector, which is a highly regulated industry. The sector is characterized by the high amount of personal data processing. Most of the measures carried out in the field of financial and insurance services concern data relating, directly or indirectly, to natural persons. Therefore, the protection of personal data is of great importance for the Group companies.

The purpose of this Statement is to guarantee that

- the processes consisting of personal data are carried out lawfully;
- employees are aware of and comply with the data protection rules;
- necessary technical and organizational measures are adopted to protect personal data;
- the individual Group companies' data protection policies and guidelines are transparent towards data subjects, stakeholders and other interested parties.

This Group level Statement demonstrates the general requirements to be fulfilled by Sampo Group companies. Each Group company has adopted more detailed policies and guidelines on data privacy for their own commercial purposes. If you intend to contact any Sampo Group company, it is recommended to familiarize yourself with the data privacy practices of the relevant company. The individual Group companies are obligated to comply with this Group level Statement and to demonstrate their accountability with the data protection rules.

1.2 Applicable Laws

Sampo Group complies with the relevant national legislation together with the provisions and principles imposed by the European Data Protection Regulation (GDPR).

2. Principles of Personal Data Protection

2.1 Lawfulness, Fairness and Transparency

Sampo Group is committed to process personal data in a lawful, fair and transparent manner.

2.2 Purpose Limitation

Sampo Group collects personal data only for the explicit and legitimate purposes necessary to carry out its business. Personal data are not further processed in a manner that conflicts with those purposes.

2.3 Data Minimization

Sampo Group processes only personal data that are adequate, relevant and limited to what is necessary regarding the purposes for which they are processed.

2.4 Accuracy

When processing personal data, Sampo Group ensures that the data are accurate. Reasonable steps are also taken to ensure that inaccurate personal data are corrected or removed without undue delay.

2.5 Storage Limitation

Sampo Group stores personal data as long as it has legal grounds for the storage. Personal data are kept in a form, which allows the identification of data subjects only for the purposes for which the data are processed. Personal data may be stored for longer periods insofar as the processing complies with legislation. Sampo Group companies will make sure that periodic reviews are carried out in order to limit the purposeless storage of personal data.

2.6 Confidentiality and Security

Sampo Group has adopted appropriate technical and organizational measures to ensure that personal data are processed in a manner, which guarantees the security of data.

The Group companies are committed to ensure that the processing of personal data is secured from an unauthorized access, loss, manipulation, destruction or other unauthorized disclosures.

In order to maintain security and to prevent unlawful processing, the adopted measures, their effectiveness and related risks are duly assessed, documented, reviewed and updated where necessary.

3. Processing of Personal Data

3.1 Nature of the Data

Due to different business activities and services the types of personal data, Sampo Group companies process, may differ. The individual Group companies provide more detailed information on the nature of personal data they process.

3.2 Objects and Grounds

Sampo Group uses personal data inter alia in order to operate and improve its business. Personal data are processed, when there exists a legal ground or obligation under the relevant legislation to process the data. The grounds for processing comply with the General Data Protection Regulation.

3.3 Internet

Personal data may be processed on any Sampo Group company's website. For more detailed information on online data privacy, we kindly ask you to visit the companies' websites, and read more about their online practices.

4. Disclosure of Personal Data

4.1 Data Sharing

Sampo Group may share personal data to third parties, when the data subject has given his/her consent to the sharing, or when the data sharing is permitted or obliged by the applicable laws.

4.2 Data Transmission

Sampo Group may transfer personal data to third parties, when the legitimate interests of any Group company or of a third party so require.

Sampo Group companies operate business in Europe, which means that personal data may be transferred and processed outside the data subject's country of domicile. Sampo Group may transfer personal data also outside the European Economic Area (EEA), for example, in cases where external service providers process the data on behalf of the Group companies.

5. Rights of data subjects

Data subjects are entitled to use their legal rights including, inter alia, the right of access, right to rectification, right to be forgotten and right to data portability. More detailed information on the exact rights granted to data subjects and how to use them on the websites of each Group company.

6. Breaches and Responsibilities

6.1 Breach

Sampo Group companies shall ensure that any incident caused by a breach of security leading to an accidental or unlawful deletion, alteration or unauthorized disclosure of or access to personal data processed by Sampo Group is reported and handled in accordance with the applicable data privacy legislation.

6.2 Breach Notification

Sampo Group companies will notify the supervisory authority in case of a data breach where it is likely to result in a risk to the rights and freedoms of individuals. Where a breach is likely to result in a high risk to the rights and freedoms of individuals, Sampo Group companies will notify those concerned in accordance with the applicable privacy legislation.

7. Changes to the Statement

Sampo Group reserves the right to change this Data Privacy Statement. Constant reviews are carried out in order to make it better. All changes will be available on the currently valid Statement.

If you have any queries or complaints concerning Sampo Group's compliance with this Statement, or you want to make any recommendations or comments to it, please take contact.



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