

CANADA PRIVACY NOTICE SUPPLEMENT

Canada's *Personal Information Protection and Electronic Documents Act* ("**PIPEDA**"), together with substantially similar provincial and territorial privacy legislation (collectively, "**Canadian Privacy Laws**"), establishes the requirements governing how organizations collect, use, and disclose Personal Information (as defined below) in the course of commercial activities. This Canada Privacy Notice Supplement ("**Notice**") provides the information required under Canadian Privacy Laws and applies to Our (as defined below) online and offline activities relating to the collection, use and disclosure of Personal Information about individuals residing in Canada ("**You**" or "**Your**"). Sompo International Holdings Ltd. and its affiliated entities, including Sompo Japan Insurance Inc. (Canada Branch) in Canada (referred to collectively as "**Sompo**", "**We**", "**Our**", or "**Us**"), are committed to protecting Your Personal Information in accordance with Canadian Privacy Laws.

This Notice supplements the [Sompo International General Privacy Notice](#) and any other privacy-related notices published on our website at www.sompo-intl.com, in each case, to the extent applicable to residents of Canada.

I. Personal Information

As used in this Notice, "**Personal Information**" means information about You as an identifiable individual. In other words, information that identifies You, or that could reasonably be used (on its own or together with other information) to identify You. This includes, for example, Your name, date of birth, home address, payment and transaction information, device and online identifiers (such as an IP address) where they can be linked to You, and the content of messages or requests You send to Us.

II. Personal Information Collected and Used

Sompo adheres to the ten (10) fair information principles set out in Schedule 1 to PIPEDA. Personal Information is collected, used, and disclosed only for purposes that a reasonable person would consider appropriate in the circumstances. In Canada, consent is the primary legal basis for the collection, use, and disclosure of Personal Information. Where Sompo relies on an exception to consent, it does so only in the limited circumstances permitted under applicable Canadian Privacy Laws.



We may collect the following categories of Personal Information in the course of Our commercial activities for the uses set out below. The type of information We collect, how We collect it, and how We use it depend on Your relationship with Us. For a full list of all Personal Information that We may collect, please review the [Sompo International General Privacy Notice](#).

User Type	Category	Personal Information Collected	Purpose of Collection and Use	Legal Basis for Processing
Website Visitor	Online Identifiers	Internet Protocol address, device identifiers, browser type, interaction logs	To enhance, refine, or safeguard Our products and services, as well as Our website and systems. This includes assessing the number of users accessing Our website and their usage patterns, identifying when users return to Our website, and storing information about You.	Express consent for analytics cookies; implied consent for essential site functionality.

Customer	Personal Records	Name, contact details (e.g., address and telephone number), payment information (e.g., bank account number), and transaction history.	To provide services, process payments, and manage customer relationships. This includes identifying and assessing risk, making underwriting decisions about insurance policies or reinsurance contracts, and administering claims.	Express consent obtained directly or through an authorized third party (e.g., broker); exceptions where applicable under Canadian Privacy Laws.
Employee	Employment and Benefits Records	Social insurance number (where permitted under Canadian Privacy	To manage payroll, benefits, performance, and workplace safety.	Express consent obtained directly from employee; exceptions where
		Laws), banking details, health benefit information, employment history. See Section IX for additional details on the Personal Information of employees.	See Section IX for additional details on the purposes for which the Personal Information of employees is collected, used, and disclosed.	applicable under Canadian Privacy Laws.

Job Applicant	Professional and Background Related Information	Resume content, references, background check information.	To evaluate suitability for employment.	Express consent obtained directly from applicant; exceptions where applicable under Canadian Privacy Laws.
Minor	Minor's Personal Information	Name, contact information (e.g., address, telephone number), age, parent/guardian information (e.g., name, address, telephone number).	To provide ageappropriate services and comply with legal protections.	Parental or guardian consent for minors under the age specified under applicable Canadian Privacy Laws; express consent of the minor where the minor is above the age specified under applicable Canadian Privacy Laws, or as otherwise required under applicable Canadian Privacy Laws.

Please note that under this Notice, and where applicable, Personal Information does not include:

- de-identified, anonymized, or aggregated information that has been modified such that it no longer reasonably permits the identification, directly or indirectly, of the individual to whom it relates; or

- business contact information used solely for the purpose of communicating with an individual in relation to their employment, business, or profession.

III. Sources of Personal Information Collected About You

We may obtain the categories of Personal Information listed above from one or more sources. Please review the [Sompo International General Privacy Notice](#) for a description of the sources from which We may collect Personal Information.

IV. Use of Personal Information for a Business Purpose

In addition to the purposes identified in the [Sompo International General Privacy Notice](#), Sompo may use or disclose Personal Information without consent in the limited circumstances permitted under applicable Canadian Privacy Laws, including:

- investigations and fraud prevention, including detecting, investigating, or preventing fraud, money laundering, terrorism, sanctions violations, or other criminal activities;
- compliance with a subpoena, warrant, court order, or as otherwise required or authorized by law;
- collection of a debt owed to Sompo;
- a prospective or completed business transaction (e.g., a merger, acquisition, or sale of assets), provided that the parties have entered into a confidentiality agreement and the Personal Information is necessary for the transaction;
- use or disclosure that is clearly in the interests of the individual where consent cannot be obtained in a timely way; and
- any other purpose permitted or required under applicable Canadian Privacy Laws.

V. Categories of Third Parties that Receive Personal Information from Sompo

Personal Information will be disclosed to different third parties depending upon the nature of Your interaction with Us. In the course of operating Our business, it may be necessary for Us to disclose Personal Information to affiliated entities, service providers, government agencies, and other third parties. Please review the [Sompo International General Privacy Notice](#) for a description of the third parties to which We may disclose Personal Information.

VI. Consent; Withdrawal of Consent

If You have provided Us with Personal Information about another individual, You confirm that You have: (a) obtained that individual's consent to the disclosure of their Personal Information to Us; (b) informed that individual that You have provided their Personal Information to Us; and (c) made that individual aware of how We will use their Personal Information, as described in this Notice.

You may withdraw Your consent at any time, subject to legal or contractual restrictions, by contacting Us as set out in Section XI. Please note that the withdrawal of consent may affect Our ability to provide You with certain products or services, particularly if the collection and use of Personal Information is essential to underwriting, claims management, or servicing Your policy. We may advise You of the consequences of such withdrawal at the time Your request is made.

If We receive Your Personal Information from a third-party service provider (e.g., an insurance broker or claims administrator), We rely on them to ensure that they have obtained Your valid consent and that the disclosure of Your Personal Information to Us is authorized and lawful. We may take reasonable steps to verify that appropriate consent has been secured.

VII. Cross-Border Data Transfers

Your Personal Information may be transferred to, stored, or processed in jurisdictions outside of Canada (including Québec), including jurisdictions that may not provide a level of protection for Personal Information equivalent to that available under Canadian Privacy Laws and your information may be accessible to the courts, law enforcement, governments, regulatory agencies and national security authorities in those jurisdictions. The following categories of third parties, which may be located outside of Canada, may have access to Your Personal Information:

- brokers, producers, insurance agents, other insurers, reinsurers and underwriters, other intermediaries and agents, appointed representatives, distributors, marketing partners, and financial institutions, securities firms or entities with which We do business;
- third parties that assist Us in carrying out Our business activities, including third party claims administrators, document and records management providers, claims investigators and adjusters, medical and health professionals, security professionals, property experts, engineers, construction consultants, financial advisers, accountants and actuaries, surveyors, loss adjusters, claims agents,

experts, lawyers, private investigators and other professionals or experts that assist Us in receiving, processing, reviewing, confirming, auditing or contesting insurance or reinsurance claims or defending the interests of an insured or the reinsurer in an insurance or reinsurance matter; and

- other service providers or vendors that process information about You on Our behalf, including information technology service providers that host or support Our business systems.

Where Personal Information is transferred outside of Canada, We will ensure that it is protected by contractual or other appropriate means, including by conducting privacy impact assessments, in accordance with applicable Canadian Privacy Laws and the [Sompo International General Privacy Notice](#). Information regarding the jurisdictions to which Your Personal Information may be transferred and the purposes for such transfers is available upon request by contacting Us as set out in Section XI.

VIII. Your Rights Under Canadian Privacy Laws

Depending on where You reside in Canada and subject to applicable Canadian Privacy Laws, You may have the following rights in respect of Your Personal Information:

- Access and Correction: You have the right to request access to the Personal Information We hold about You and to request corrections if the information is inaccurate or incomplete. We commit to responding to access requests within thirty (30) days of receipt. However, if Your request is particularly complex or if multiple requests are received from You, We may extend this period by a further thirty (30) days. We will inform You of any delays and the reasons for any extensions within the initial thirty (30) day period. If We are unable to provide access to certain information, We will provide You with the reasons for the refusal.
- Deletion: You may have the right to request deletion of Your Personal Information from Our records. However, We may be required by law, or Our contractual or other legal obligations, to retain certain Personal Information for a prescribed period. In such circumstances, We will process Your deletion request once the applicable retention period has expired. However, We may retain de-identified, anonymized, or aggregated information derived from Your use of Our websites and services, which can no longer be used to reasonably identify You, whether directly or indirectly.

Where We have disclosed Your Personal Information to a third party prior to receiving Your deletion request, We may no longer have the ability to access or control that information as held by the third party. Accordingly, We cannot guarantee the deletion of Personal Information that has been disclosed to third

parties, though We will take reasonable steps to notify such parties of Your request, where required by applicable Canadian Privacy Laws.

- Use, Disclosure, and Objection: You may have the right to request that We restrict Our use or disclosure of Your Personal Information for certain purposes, or object to the processing of Your Personal Information. We are not obligated to agree to any such request. We will agree to restrict the use or disclosure of Your Personal Information where applicable Canadian Privacy Laws permit Us to do so and where We determine that the restriction does not impair Our ability to operate Our business, provide services, or comply with applicable law. Even where We agree to a restriction or objection, We may continue to use or disclose Your Personal Information for purposes permitted or required by law.
- Automated Decision Making: Where We use automated processing to make a decision about You that produces legal or similarly significant effects, We may inform You at the time the decision is made that it was made exclusively by automated processing. You may have the right to request an explanation of the decision, including the principal factors and parameters that led to it, to submit observations to a designated person within Sompo, and to request that a qualified individual review the decision.
- Data Portability: You may have the right to request a copy of Your Personal Information in a structured, commonly used, and machine-readable format. You may also request that We transfer Your Personal Information directly to another organization, where technically feasible. This right applies to Personal Information that You have provided to Us, as well as Personal Information that has been generated as a result of Your use of Our services.

IX. Personal Information of Employees

This Section applies to job applicants, candidates, current and former employees, independent contractors, and other individuals whose Personal Information is collected in connection with their employment or prospective employment relationship with Sompo in Canada (collectively “**Employees**” for the purposes of this Section). This Section supplements the [Sompo International Employee Privacy Notice](#) and should be read together with the other Sections of this Notice, which apply equally to Employees except where this Section provides otherwise.

A. Categories of Employee Personal Information Collected

Sompo may collect the following categories of Personal Information from or about Employees. The categories and examples listed below are representative and not exhaustive. For a full list of all Personal Information that We may collect, please review the [Sompo International Employee Privacy Notice](#).

- Identifiers: Legal name, alias, date of birth, postal address, telephone or mobile contact number, personal email address, social insurance number (where permitted under applicable Canadian Privacy Laws), and other unique personal identifiers.
- Employment and Professional Records: Employment history, CV or résumé, job title, department, work location, start and end dates of employment, performance evaluations, disciplinary records, training records, professional licences and certifications, and references.
- Financial Information: Bank account details, tax-related information, compensation and salary details, bonuses, expense reimbursements, pension contributions, and payroll records.
- Health and Benefits Information: Health benefit enrolment information, disability and accommodation records, workplace injury reports, workers' compensation claims, and medical certificates.
- Protected Characteristics: Information relating to age, sex, gender, race, ethnic origin, religion, disability, marital or family status, and other characteristics protected under applicable federal, provincial or territorial human rights legislation.
- Background and Security Information: Criminal record check results, credit check results, security clearances, and immigration or work authorization status.
- Electronic and Network Activity Information: IT system usage logs, email metadata, internet browsing activity on Sompo systems, badge or access card records, and device identifiers.
- Geolocation Data: Location data derived from company-issued devices or vehicles, where applicable.



- Sensory Data: Closed-circuit television (CCTV) footage, photographs, audio recordings, and video recordings captured in the workplace.
- Biometric Information: Fingerprints, facial recognition data, or other biometric identifiers, where collected for security or access control purposes.
- Education Information: Academic transcripts, diplomas, degrees, professional development records, and continuing education credits.
- Beneficiary and Emergency Contact Information: Name, address, telephone number, and relationship details of Your designated beneficiaries and emergency contacts.
- Inferences: Profiles or assessments derived from any of the above categories, used for workforce planning, performance evaluation, or succession planning purposes.

B. Sources of Employee Personal Information

We may collect the Personal Information of Employees from the following sources:

- directly from You (e.g., during recruitment, onboarding, or in the course of the employment relationship);
- from third parties, including former employers, referees, background check providers, benefits administrators, and government agencies;
- from Your use of Sompo IT systems, devices, and facilities; and
- from publicly available sources, including professional networking platforms.

C. Purposes of Collection, Use, and Disclosure of Employee Personal Information

We collect, use, and disclose the Personal Information of Employees for the following purposes:

- recruitment, hiring, and onboarding;
- payroll administration, tax remittances, and compensation management;

- benefits administration, including health, dental, disability, life insurance, pension, and retirement savings plans;
- performance management, training, career development, and succession planning;
- workplace health and safety, including workplace injury reporting and workers' compensation claims;
- compliance with applicable legal and regulatory obligations, including employment standards, human rights, occupational health and safety, tax, and immigration laws;
- internal investigations, discipline, and grievance resolution;
- security and fraud prevention, including IT security, physical security, and access controls;
- business operations, workforce planning, and organizational restructuring;
- responding to legal proceedings, court orders, or regulatory inquiries; and
- any other purpose identified at or before the time of collection and to which You have consented or which is permitted or required by applicable law.

D. Disclosure of Employee Personal Information

In the course of operating Our business, We may disclose the Personal Information of Employees to the following categories of third parties:

- affiliated entities within Sompo International;
- payroll, benefits, and pension plan administrators;
- government agencies and regulators (e.g., the Canada Revenue Agency, provincial workers' compensation boards, employment standards authorities);
- insurance providers (e.g., group benefits insurers, workers' compensation insurers);
- professional advisors, including legal counsel, auditors, and accountants;

- background check and security screening providers;
- IT service providers and data hosting providers; and
- any other third party with Your consent or as permitted or required by applicable law.

Where the Personal Information of Employees is transferred outside of Canada, including outside of Québec, the provisions of Section VII of this Notice apply.

E. Consent for Employee Personal Information

Subject to applicable Canadian Privacy Laws, We may collect, use, and disclose the Personal Information of Employees without consent where doing so is reasonable for purposes related to establishing, managing, or terminating the employment relationship between Us and the Employee. Where consent is required, We will obtain it at or before the time of collection.

We will obtain Your express consent before collecting, using, or disclosing any Personal Information that is classified as sensitive under applicable Canadian Privacy Laws, including health information and biometric information. For all other Personal Information, We will notify You of the purposes for which Your Personal Information is being collected and will obtain Your implied or express consent, as applicable, unless an exemption under applicable Canadian Privacy Laws applies.

F. Employee Monitoring and Surveillance

Sompo may monitor its IT systems, electronic communications, and workplace premises for legitimate business purposes, including:

- ensuring the security and integrity of its systems and networks;
- preventing and detecting fraud or unauthorized use;
- enforcing workplace policies; and
- complying with applicable legal and regulatory obligations.

Any such monitoring will be conducted in a manner that is proportionate to these purposes and in accordance with applicable Canadian Privacy Laws.



In Québec, before implementing any technology that permits the monitoring or surveillance of Employees, Sompo will inform affected Employees of: (a) the purposes for which such technology is used; (b) the means of monitoring or surveillance employed; and (c) the rights of Employees in relation to such monitoring, including the right to be informed of, and to access, any Personal Information collected through the use of such technology.

X. Changes to this Notice

We may amend this Notice from time to time to reflect changes in Our privacy practices, to comply with changes in applicable legal or regulatory requirements, or to address new or evolving operational needs. When We amend this Notice, We will update the effective date set out below and post the revised Notice on Our website. Where a material change is made to this Notice, We will, where required by applicable Canadian Privacy Laws, provide You with reasonable prior notice of the change through appropriate means, which may include direct communication to You by email or other contact information We hold on file. We encourage You to review this Notice periodically to stay informed about how We collect, use, and disclose Your Personal Information.

XI. Contacting Us or Exercising Your Canadian Privacy Rights

If You wish to exercise any of Your rights under applicable Canadian Privacy Laws, or if You have any questions, concerns, or complaints regarding Our collection, use, or disclosure of Your Personal Information, please contact Us at:

Sompo Japan Insurance Inc. (Canada Branch)
Suite 3100, 199 Bay Street
Commerce Court, P.O. Box 254
Toronto, Ontario M5L 1E9

Attention: Privacy Officer, Canada
Email: Privacy@sompo-intl.com
Phone Number: (437) 696-8793

If You wish to make a complaint about Sompo's collection, use, or disclosure of Your Personal Information, You may also contact the Office of the Privacy Commissioner of Canada (www.priv.gc.ca). In addition, depending on Your province of residence, You may contact the applicable provincial privacy commissioner:

- the Commission d'accès à l'information du Québec (www.cai.gouv.qc.ca), if You reside in Québec;



- the Office of the Information and Privacy Commissioner of Alberta (www.oipc.ab.ca), if You reside in Alberta; or
- the Office of the Information and Privacy Commissioner for British Columbia (www.oipc.bc.ca), if You reside in British Columbia.

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