



## Global Applicant Privacy Notice

Welcome to the Sompo International Holdings Ltd. Careers Site (the “Site”). The Site serves as the centralized career application portal for Sompo International Holdings Ltd. and its subsidiaries and affiliates (collectively, “we”, “us”, or “Sompo”). Sompo is a global specialty provider of property and casualty insurance and reinsurance. Because we gather certain types of information about applicants during the recruitment process, we want to help you understand our practices surrounding the collection, use and disclosure of your personal information.

This Privacy Notice addresses the following topics:

- Equal Employment Opportunity Statement
- Assistance for Applicants with a Disability
- Your Consent
- Scope of This Notice
- Personal Information We Collect About You
- Categories of Sources of Your Personal Information
- How We May Use Your Personal Information
- How We May Disclose Your Personal Information
- Retention of Your Personal Information
- International Transfers of Your Personal Information
- Security For Your Personal Information
- How to Access, Correct, or Delete Personal Information in Your Account
- Jurisdiction-Specific Information
- Changes to this Notice
- Inquiries and Concerns

### Equal Employment Opportunity Statement

Sompo is an equal employment opportunity employer. Sompo will not discriminate or tolerate discrimination against any applicant or employee on the basis of race, color, sex, religion, national origin, age, disability, or any other consideration made unlawful by applicable laws and regulations. Sompo also prohibits harassment of applicants and employees based on any of these protected categories.

For United States (“U.S.”) Applicants: It is also Sompo’s policy to comply with all applicable laws respecting consideration of unemployment status in making hiring decisions. Sompo complies with the Americans with Disabilities Act (“ADA”), the ADA Amendments Act of 2008 (“ADAAA”) and applicable state law, and considers reasonable accommodation measures that may be necessary for qualified applicants/employees to perform the essential functions of the job. Hire may be



contingent upon a post-offer medical examination, and to skill and agility tests, as appropriate for the position.

#### Assistance for Applicants with a Disability

Alternative methods of applying for employment are available to individuals unable to submit an application through this Site because of a disability. Contact [careers@sompo-intl.com](mailto:careers@sompo-intl.com) to discuss modifications.

#### Your Consent

To submit your job application, you will be required first to create an account with us. After providing the required account information, you will need to click on “I understand and have read the Sompo Global Applicant Privacy Policy. I consent to the collection, use, disclosure, transfer across borders and other processing of your personal information as described in the Sompo Global Applicant Privacy Policy.” By checking the box, you consent to the collection, use, disclosure, transfer across borders and other processing of your personal information as described below. Once you agree, your consent will continue to apply to our collection, use, disclosure, cross-border transfer and other processing of your personal information unless you revoke your consent by contacting us at [privacy@sompo-intl.com](mailto:privacy@sompo-intl.com).

If you click "Decline," you will not be able to proceed to the online application page to apply for global career opportunities within Sompo corporate group, and Sompo may not be able to consider you for the position for which you wish to apply.

Alternatively, if you choose to “Introduce Yourself” to Sompo through the “Introduce Yourself” page, by clicking “Submit” you consent to the collection, use, disclosure, transfer across borders and other processing of your personal information as described below. Once you agree, your consent will continue to apply to our collection, use, disclosure, cross-border transfer and other processing of your personal information unless you revoke your consent by contacting us at [privacy@sompo-intl.com](mailto:privacy@sompo-intl.com).

#### Scope of This Notice

This Privacy Notice applies only to information collected for recruitment purposes through the Site and from other sources. The other sources might include information that you provide other than through the online application page as well as information obtained, for example, from prior employers, other references, pre-employment screening providers, and educational institutions. This Notice does not apply to any other site or page that we own or operate. Our other sites have their own privacy policies.

#### Personal Information We Collect About You

If you choose to apply for a position with us, the categories of personal information that we may collect about you through the Site and other sources are listed below. Please remember that you are responsible for providing information that is accurate, complete and up to date when you disclose information to us during the employment process.

<input type="checkbox"/> Identifiers: Full name, postal address, telephone number, e-mail address, Internet Protocol (IP) address, and signature.
<input type="checkbox"/> Professional or Employment-Related Information: We may collect your resume and information about your employment history (e.g., dates of employment and last position held), educational history (e.g., degrees earned, certifications obtained), professional licenses and/or certifications. We may also collect any information you disclose voluntarily through your LinkedIn or Indeed profiles.
<input type="checkbox"/> Internet or Other Similar Network Activity: We may collect information regarding your interaction with the Site, including through the use of cookies. Please find more information about our use of cookies in our <a href="#">General Privacy Policy</a> in the section on “Cookies and other Technologies” to learn about the information we collect automatically using cookies when you visit the Site. If you visit our offices during the recruitment process and use our guest WiFi, we may collect information about that
use, such as type of device used and start/stop time. We also may collect information from your publicly available social media content (other than LinkedIn and Indeed).
<input type="checkbox"/> Other Information Submitted With Your Online Application: (a) any personal information submitted as part of your response to our question asking why you chose to apply for a position with Sompo; (b) your eligibility to work in the country where you reside; and (c) language(s) spoken.

**Information About Protected Classification:** When you apply for a position in the U.S. or indicate the U.S. as a preferred location when registering your profile, you will have the opportunity to provide information about your protected classification, i.e., gender, race/ethnic origin and/or veteran status in order for us to conduct equal opportunity monitoring. The provision of this information is entirely voluntary. If you decline to provide this information, your application(s) will not be affected in any way. If you do choose to provide this information, you consent to our using it for equal employment opportunity monitoring purposes. This information will be held and stored anonymously and will not be used to evaluate your application for employment and also will not be used to infer any characteristics about you.

Except as described above, we will not request or otherwise collect information about your health, race or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, or sexual orientation or your genetic information or biometric information through the on-line application or during the application process unless the law, as an exception, requires us to do so. We, or a third-party background check company under our direction, may check criminal history records for information about convictions, but only if and to the extent permitted by applicable law.



## Categories of Sources of Your Personal Information

We may collect the categories of personal information listed above from the following sources:

- You, for example, in your job application, forms you fill out for us, assessments you complete, surveys you complete, and any information you provide us during the course of your application and interview process.
- Vendors and service providers, for example, recruiters.
- Third parties, for example, job references, affiliated companies, professional employer organizations or staffing agencies.
- Public internet sources, for example, social media, job boards, public profiles, and other public online sources
- Public records, for example, court records, and credentialing and licensing organizations.
- Automated technologies on Sompo's electronic resources, for example, to track logins and activity on Sompo's careers page.
- Surveillance/recording technologies installed by Sompo, for example, video surveillance in common areas of Sompo facilities, voicemail technologies, webcams, and audio/video recording technologies with consent to the extent required by law.
- Government or administrative agencies, for example, law enforcement or public health authorities.
- Acquired company, if Sompo acquired your employer, Sompo might collect personal information from that employer.

## How We May Use Your Personal Information

We will use the information that we collect about you for purposes of the hiring process, including:

### **Recruiting**

- To evaluate your qualifications or suitability for employment with us
- To communicate with you
- To check your references
- To conduct a pre-employment or criminal history background check
- For identification purposes
- For diversity and inclusion purposes where permitted by applicable law
- For recordkeeping purposes
- To demonstrate your agreement to, or acceptance of, documents presented to you, (e.g., pre-employment arbitration agreement, acknowledgment of employment application, offer letter)
- To evaluate and improve the recruiting process



- To comply with our legal obligations and to defend against administrative charges or legal claims

### **If you visit our facilities**

- To make travel arrangements
- To reimburse travel expenses
- To managed access to the facility
- To issue a security badge
- To maintain security during the visit.
- To monitor your use of the corporate Internet access if you connect to our guest WiFi during a visit to our offices

You may also choose to receive automated emails about positions within Sompo at the e-mail address you provided informing you of positions that may fit your profile. To stop receiving these emails at any time, you can click the "unsubscribe" link at the bottom of these emails. You may also choose to stop receiving these emails (or to begin receiving them if you had previously elected not to) by signing into the online application, selecting "My Account Options" at the top of the page, and then editing your preferences in the 'Correspondence' section of the "My Account" page.

Sompo's employees involved in the evaluation of your application and, if you are hired, in the administration of your employment relationship with Sompo will have access to your personal information on a need-to-know basis.

Lawful Basis For Processing: Where applicable information protection law requires a lawful basis for collecting, using and otherwise processing your personal information, Sompo relies on your consent to do so. The processing of your personal information also is necessary for Sompo to determine whether to enter into an employment agreement with you. If you do not provide requested information, Sompo may not be able to consider you for employment. In addition, the processing of your personal information is necessary for Sompo to pursue its legitimate interests in recruiting and hiring suitable personnel.

### **How We May Disclose Your Personal Information**

Sompo will not sell, lease, or license your personal information to any third party. There are limited circumstances when Sompo may disclose the personal information we collect about you to third parties, most notably:

- **Service Providers:** With third-party service providers. We may, for example, retain a service provider to host all or portions of this Site, to help maintain and manage our databases, to assist in the recruiting process, or to conduct pre-employment screening. Service providers will be permitted to use your personal information only for the purpose(s) for which it was disclosed to them and in



accordance with Sompo's instructions. Service providers generally will be located only in the United States or in the country where you are applying for a position;

- Corporate Affiliates: With affiliated companies, such as grandparent, parent and/or subsidiary corporations, for their recruitment, recordkeeping and/or reporting purposes;
- Required By Law: When required by law, such as when we respond to subpoenas, court orders, legal process, or a discovery request in civil litigation;
- Legal Violations: If we believe that your actions violate applicable law, or threaten the rights, property, or safety of our Company, our users, or others;
- Corporate Transactions: If we sell some or all of our business, we may disclose all of the information that we have collected about you to a purchaser or, in due diligence, to a potential purchaser, but subject to a confidentiality agreement.

Sompo will make such disclosures only as permitted by applicable information protection laws.

#### Collection and Use of Personal Information Provided by Recruiters, Referrers, Onboarding Professionals and Staffing Agencies

This section of the Privacy Notice applies to recruiters, referrers, onboarding professionals and staffing agencies that provide personal information about themselves or about applicants whose information they submit to Sompo. Applicants can skip this section of the Privacy Notice; it does not apply directly to them.

- Any information you provide about yourself or any applicant may be used in accordance with this Privacy Notice, including as described above.
- Your use of the Site obligates you and the entity for which you work to comply with this Privacy Notice.
- In your role as a recruiter, referrer, on-boarding professional or staffing agency, you must ensure that you have obtained the applicant's explicit consent to submit information on their behalf (including, without limitation, to the use and international transfer of such information as described above).
- You will be responsible for ensuring that the information you provide is accurate and up to-date.
- You must provide the Site with the applicant's up-to-date e-mail address.
- You must ensure that your use and disclosure of applicant information maintained by the Site, or related applications is in compliance with the above, and that you comply with all relevant legal requirements.

#### Internal References

As part of our application process, you are given the opportunity to provide the name or email address of any Sompo employee who referred you to apply for the position for



which you are submitting an application through this Site. You are not required to provide an employee reference. If you do submit the name of an internal reference Sompo will ask that employee: (1) if they referred you to apply; and (2) if they endorse your application. By submitting the name or email address of an internal reference you are confirming that you have received the explicit consent of the Sompo employee to submit their personal information.

#### Retention Of Your Personal Information

If Sompo hires you, the information that you submitted through the online application and the information that we collect during the application process will become part of your personnel file and may be used to administer the employment relationship and for related reporting and recordkeeping purposes. Sompo will retain this information for the entire duration of your employment relationship with Sompo and for the period thereafter identified in Sompo's International Records Retention Schedule, which is available on Sompo's corporate intranet.

Sompo will retain the information of applicants who are not hired for one year after the hiring decision has been made unless (a) the applicant indicates that we may maintain the information on file until the applicant asks to delete the information, or (b) a shorter or longer retention period is legally required. These records will be retained for our internal recordkeeping and reporting purposes. During that time, we may use your personal information to consider you for positions in addition to the position(s) for which you initially applied. If you wish to withdraw your application from consideration at any time during this retention period, please log into your account and choose "Candidate Home," "Edit Account Settings," and select "Delete My Information."

#### International Transfer of Your Personal Information

If you are applying for a position with us from outside the U.S., the personal information that we collect about you in the recruitment process will be transferred to, and stored on, our servers, located in the U.S., and on servers maintained by our recruitment service provider which may result in the international transfer of your data. Authorized employees of Sompo and/or affiliated companies at locations outside the United States may have access to your personal information as part of the recruitment process. These employees may use and disclose your personal information only for recruitment purposes and must handle that information in accordance with this Privacy Notice and applicable information protection laws and guidance. The information protection laws where these companies are located may be less stringent than the laws of your home country. Contact details of the Sompo corporate group companies that may access your personal information can be obtained by emailing [careers@sompo-intl.com](mailto:careers@sompo-intl.com).

If you reside in the European Union ("EU"), Switzerland, or the United Kingdom ("UK"), we have taken steps to ensure an adequate level of protection for your transferred personal information, including through contractual clauses approved by the applicable data protection authority (the "SCCs") to which Sompo, its U.S. subsidiaries and its subsidiaries in the EU, Switzerland and the UK are parties. You may obtain a copy of



the SCCs by submitting a request to [privacy@sompo-intl.com](mailto:privacy@sompo-intl.com). If you reside in other countries with restrictions on cross-border data transfers, such as Brazil, we rely on your consent for the transfer of your personal data outside your country of residence.

For Japan Only: For international data transfers to the United States, the applicable information with respect to the personal data requirement of the United States can be found here at [https://www.ppc.go.jp/files/pdf/USA\\_report.pdf](https://www.ppc.go.jp/files/pdf/USA_report.pdf) (Federal)  
[https://www.ppc.go.jp/files/pdf/california\\_report.pdf](https://www.ppc.go.jp/files/pdf/california_report.pdf) (California)  
[https://www.ppc.go.jp/files/pdf/newyork\\_report.pdf](https://www.ppc.go.jp/files/pdf/newyork_report.pdf) (New York)  
[https://www.ppc.go.jp/files/pdf/illinois\\_report.pdf](https://www.ppc.go.jp/files/pdf/illinois_report.pdf) (Illinois)

### Security For Your Personal Information

We want you to feel confident about providing your personal information through the online application page, so we have implemented a security program to keep information that is transmitted to our systems protected from unauthorised access. Your submissions of information to our secure server are protected by Hypertext Transfer Protocol Secure (“HTTPS”) and Transport Layer Security (TLS) technology, utilized by many popular browsers to safeguard transmissions. This technology allows us to use encryption tools to protect information transmitted between your computer and our server. After we have received your information, access to it is limited to employees with a need to know.

While we strive to protect your personal information, we cannot guarantee the security of any information that you submit through the online application, and you do so at your own risk. We urge you to keep your username, password and any other log-in credentials in a safe place as you share responsibility for maintaining the confidentiality of the information that you submit to us. It is a good practice to sign off your account and close your browser window when you have finished your visit to the Site.

How to Access, Correct, or Delete Your Personal Information in Your Account If you would like to access the information that you have submitted through the online application page; wish to request that we update, modify, or delete your information, please log into your account and choose “Candidate Home” and “Edit Account Settings.” If you have any questions about this Privacy Notice, please contact [privacy@sompo-intl.com](mailto:privacy@sompo-intl.com).

### Changes to This Notice

Sompo may change this Privacy Notice from time to time in its sole discretion. If we make a material change to this Notice, we will inform you by posting a notice on the Site. Those changes will go into effect on the effective date posted in the revised notice. The new policy will apply to all current and past users of the online application page and to all information collected before the date of the change. The new policy will replace any prior policies that are inconsistent. Please check periodically for changes to this Notice, and especially before you provide any personal information to us. If we will materially change how we use, disclose or otherwise process your personal



information, we will contact you before doing so and obtain your consent before using, disclosing or otherwise processing your personal information other than as described in this Notice.

#### Inquiries and Concerns

Please direct any questions or concerns you may have about this Privacy Notice to [privacy@sompo-intl.com](mailto:privacy@sompo-intl.com).

#### Jurisdiction-Specific Information

- California
- All locations outside of the United States
- European Economic Area, United Kingdom, and Switzerland

#### **California**

This section applies only to individuals who reside in the state of California in the United States (“California residents”). This section applies to personal information collected through Site and in any other way, such as when California residents visit our offices.

California Notice at Collection: Sompo collects the categories of personal information identified in the section on “Categories of Sources of Your Personal Information” above, for the purposes identified in the section “How We May Use Your Personal Information” above, and retains personal information for the period described in the section on “Retention of Your Personal Information”. We do not, and will not, sell your personal information or disclose it to third parties for cross-context behavioral advertising. We also do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

#### Additional Information Regarding Disclosures of Personal Information

The California Privacy Rights Act (CPRA) requires that we provide you with the following information about disclosures of your personal information to third parties for “business purposes”, as that term is defined in the CPRA:

- Service providers: Sompo may disclose to service providers any of the categories of personal information listed in the section on “Categories of Sources of Your Personal Information,” above, for the business purpose of performing services on Sompo’s behalf and, in particular, for the specific purposes described in “How We May Use Your Personal Information”, above.
- Auditors, lawyers, consultants, and accountants engaged by Sompo: Sompo may disclose the categories of personal information listed in the section on “Categories of Sources of Your Personal Information”, above, to these services providers or contractors for the business purpose of auditing compliance with policies and applicable laws, in addition to performing services on Sompo’s behalf.



- Affiliated companies: Sompo may disclose any of the categories of personal information listed in the section on “Categories of Sources of Your Personal Information”, above, to other companies within the Sompo family of companies for the business purposes of (a) auditing compliance with policies and applicable laws, (b) helping to ensure security and integrity, (c) debugging, (d) short-term transient use, (e) internal research, and (f) activities to maintain or improve the quality or safety of a service or device.

### Your California Privacy Rights

Subject to applicable exceptions, California residents have the following rights under the California Privacy Rights Act (“CPRA”):

- Right to Know: You have the right to submit a verifiable request for specific pieces of your personal information obtained from you and for information about Sompo’s collection, use, and disclosure of categories of your personal information.
- Right to Delete: You have the right to submit a verifiable request to delete personal information that Sompo has collected from or about you.
- Right to Correct: You have the right to submit a verifiable request to correct inaccurate personal information about you maintained by Sompo, taking into account the nature of the personal information and the purposes of processing the personal information.

Non-Discrimination: Sompo will not unlawfully discriminate against you for exercising your privacy rights under the California Privacy Rights Act.

### How to Exercise Your California Privacy Rights

Sompo will respond to request to know, delete, and correct in accordance with applicable law if it can verify the identity of the requestor. You can exercise these rights in the following ways:

- Call 1-855-869-9217;
- Email: [privacy@sompo-intl.com](mailto:privacy@sompo-intl.com); and
- Complete the request form available here: <https://www.sompo-intl.com/privacy-request/>.

### How We Will Verify Your Request

The processes that we follow to verify your identity when you make a request to know, correct, or delete are described below. The relevant process depends on how and why the request is submitted.

For a general request, such as a request to know how we handle your personal information, we will match at least two information points that you provide against information about you that we already have in our records and that we have determined to be reliable for purposes of verifying your identity.



For an escalated request, such as a request for specific pieces of your personal information, we will match at least three information points that you provide against information that we already have about you in our records and that we have determined to be reliable for purposes of verifying your identity.

We have implemented the following additional procedures when verifying the identity of requestors:

1. If we cannot verify your identity based on the processes described above, we may ask you for additional verification information. If we do so, we will not use that information for any purpose other than verification.
2. If we cannot verify your identity to a sufficient level of certainty to respond to your request, we will let you know promptly and explain why we cannot verify your identity.

#### Authorised Agent

If an authorised agent submits a request to know, correct, or delete on your behalf, the authorised agent must submit with the request a document signed by you that authorises the authorised agent to submit the request on your behalf. In addition, we may ask you to follow the applicable process described above for verifying your identity. You can obtain an “Authorised Agent Designation” form by contacting us at [privacy@sompo-intl.com](mailto:privacy@sompo-intl.com).

#### Note on Deidentified Information

At times, Sompo converts personal information into deidentified information using reasonable measures to ensure that the deidentified information cannot be associated with the individual (“Deidentified Information”). Sompo maintains Deidentified Information in a deidentified form and does not attempt to reidentify it, except that Sompo may attempt to reidentify the information solely for the purpose of determining whether its deidentification processes ensure that the information cannot be associated with the individual. Sompo prohibits vendors, by contract, from attempting to reidentify Sompo’s Deidentified Information.

#### **All locations outside of the United States**

The data controller of your personal information is the Sompo corporate group member to which you are applying for employment. Contact details for each corporate group member can be obtained by emailing [careers@sompo-intl.com](mailto:careers@sompo-intl.com).

The personal information collected through the Site is downloaded to a server maintained by Sompo, or its service provider, in the United States. The laws of the United States may provide a different level of protection for your personal information than what is required in the country where you reside.

To the extent provided by applicable law and subject to any relevant exceptions, you may be able to exercise the following rights.

- **Access:** The right to request access to your personal information maintained by Sompo.
  - More on the right of access: European Individuals' right to access their personal information includes their right to receive a copy of all, or a portion, of their personal information in Sompo's possession as long as Sompo's providing the personal information would not adversely affect the rights and freedoms of others.
- **Rectification:** The right to request that Sompo update or correct your personal information that is outdated or inaccurate.
- **Deletion:** The right to request that Sompo to delete/erase your personal information.
- **Restrict Processing:** The right to request restriction of processing of your personal information in certain situations, such as while a dispute concerning the accuracy of personal information is being resolved.
- **Withdraw Consent:** The right to withdraw your consent to the processing of your personal information, at any time, where you previously consented to the processing of your personal information.
  - More on the right to withdraw consent: Any withdrawal shall not affect the lawfulness of processing based on your consent before its withdrawal, and Sompo will continue to retain the personal information that you provided us before you withdrew your consent for as long as allowed or required by applicable law.
- **Right to Lodge a Complaint:** If you believe that your personal information has been processed in violation of applicable information protection law, you may have the right to lodge a complaint with the competent supervisory authority in the country where you reside.

Additional rights may be available to you under applicable information protection law. Sompo will recognize any additional rights you may have under applicable law, but it will not grant you more rights than applicable law provides.

#### How To Exercise Your Rights

You can contact [privacy@sompo-intl.com](mailto:privacy@sompo-intl.com) request to exercise your data rights. Sompo will respond to requests to exercise individual data rights in accordance with applicable law.

Sompo maintains a data protection officer or representative as follows: Matthias Hinze, Global Data Privacy Officer, who may be reached at [privacy@sompo-intl.com](mailto:privacy@sompo-intl.com).

#### **European Economic Area, United Kingdom, and Switzerland**

The information in this section applies to applicants who reside in the European Economic Area



(EEA), the United Kingdom (UK), and Switzerland (collectively, “Europe”). Individuals in Europe (“European Individuals”) are not required by statute or by contract to provide any personal information to the Site.

#### No Automated Decision-Making

Sompo will not use European applicants’ personal information submitted through the Site for automated decision-making, including profiling, that produces legal effects or similarly significantly affects the European applicants.

#### Your Additional Rights

To the extent provided by applicable law and subject to any relevant exceptions, European applicants have the rights identified in the section entitled “All locations outside of the United States” as well as the right to data portability and right to object as described below:

- **Data Portability:** You have the right to request that Sompo transfer your personal information to a third party.
  - **More on the right to information portability:** Subject to certain limitations, the right to information portability allows you to obtain from Sompo, or to ask Sompo to send to a third party, a copy of your personal information in electronic form that you provided to Sompo in connection with your interactions with Sompo.
- **Objection:** You have the right to object to the processing of your personal information.
  - **More on the right to object:** You have the right to object when processing of your personal information is based solely on Sompo’s legitimate interests. If you do object in these circumstances, the processing of your personal information will be stopped unless there is an overriding, compelling reason to continue the processing or the processing is necessary to establish, pursue or defend legal claims.
- **Right to Lodge a Complaint:** If European Individuals believe that their personal information has been processed in violation of applicable information protection law, they have the right to lodge a complaint with the competent supervisory authority in the country where they reside, where they work, or where the alleged violation occurred.
  - Individuals who reside in the European Union can find their competent supervisory authority [EU Members Information](#).
  - Individual who rise in Switzerland can find their competent supervisory authority [Welcome to the Federal Data Protection Website](#).
  - Individuals who reside in the UK can find their competent supervisory authority [ICO UK GDPR Guidance and Resources](#).



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