

22 January 2025

Privacy Policy

This policy tells you about two things. First, it is a privacy notice and tells you how we may use the personal information we collect from you. Second, it contains important information for you to be aware of when communicating with us electronically.

The Sompo Foundation (the "Foundation") is a distinct, not-for-profit undertaking from the group of businesses affiliated with Sompo International Holdings, Ltd. or Sompo Holdings, Inc. ("Sompo"). While the Foundation may be funded by Sompo, it is independent from it. Specifically, the Foundation does not carry on any form of insurance business, nor is it authorized to do so. The Foundation is the data controller in respect of personal information collected from you.

PRIVACY NOTICE

1. Privacy of your information

We appreciate that you, or a third party on your behalf, may have provided us with your personal information. Obtaining personal information from our individual and corporate partners is central to our goal of providing exceptional service. However, we understand that in receiving this information, you expect us to treat it in an appropriate manner.

This policy is designed to provide you with further details on the type of information that we may collect about you, the purposes we might use that information for and the actions we take to safeguard your information.

2. Where we may collect information from

We will gather information from a number of sources. Typically, it is primarily drawn from requests for funding or other support from the Foundation or as a result of the Foundation working with you in respect of a collaborative project or pursuant to a request by you to the Foundation for information. After a relationship is established and develops, we may gather further information from you as you interact with us or make requests of us.

In addition to the information provided directly by you, we may gather information about you from a broad range of third parties. This includes other persons that you may instruct to assist you with your dealings with the Foundation, for example, your professional advisers or other partners. We may also seek information from individual reporting agencies about you. Third parties may be asked to undertake due diligence about you to assist us establish and maintain relationships which we believe are in the best interests of the Foundation.

We may also collect information from publicly available sources so that the Foundation can research potential funding opportunities and understand developments in the market. This could include, for instance, information about the management and other personnel at an organization which the Foundation may be interested in collaborating with.

We may record communications with you, including retention of e-mails. We will do this in a proportionate manner and always in accordance with applicable laws and regulations designed to protect your privacy in this sensitive area. Typically we would not access your information regularly in this way. Rather, it will be used for compliance, internal control or security purposes.

Lastly, we may use closed-circuit television and recording systems in our offices to protect our staff and physical assets. The owners of the buildings we occupy may operate similar systems. As a result, your physical image may be captured by us on our premises.

3. The type of information we may collect

If you deal with the Foundation in an individual capacity or as the settler or trustee of a trust or the owner, member or employee of an organization, we may collect the following types of personal information about you.

Type of Information	Examples
Personal details	Name, age, occupation and relationship status.
Contact details	Address, telephone, fax and email (both private and work-related).
Personal identifiers	Social Security Number, Taxpayer Identification Number.
Video images and audio	CCTV pictures and audio, recordings of phone conversations, presentations given by you to or with the Foundation.
Your personal history	Information about your current or former employers, education, business activities, affiliations, roles and responsibilities.

Type of Information	Examples
Your browsing information	Internet protocol (IP) address, information about your visit to the site such as the pages you visited and clickstream to and from our site.

If you deal with the Foundation in the capacity of an officer, employee, director or principal of one of our organizational partners, the typical personal information we collect about you would additionally include your role/position/title and area of responsibility and your authority.

Of course, except as otherwise agreed in particular contexts with us, you are not required to supply any of the personal information that we may request from you. However, please note that failure to supply such information may result in your being unable to engage with the Foundation. It may limit the Foundation’s ability to collect donations from you or to make grants to you or your organization. While we make reasonable efforts to ensure that all information we hold about you is accurate, complete and up-to-date, you can help us in this regard by promptly notifying us if there are any changes to your personal information. In certain cases, this is of such importance that we will ask you to represent that you will do so.

4. How we use your information

We may use your personal information in a range of different ways.

Activity	Details
Grantee – establishing relationships	We will use your personal information to assist us in establishing our partnerships and conducting grant-making activities. Examples would include entering your name as shareholder, compliance with our “know your grantee” obligations and ensuring we have the correct records to comply with our tax reporting obligations.
Contact details	We will maintain records of your contact details and the manner in which you wish to be contacted, for example, by phone, fax, post or e-mail.
Reporting	We may use personal information to provide you with details relating to grant-making including issuing confirmations and periodic statements.

Activity	Details
Provision of research and other services	We may use personal information to provide you with information (such as research), or generic advice concerning the Foundation.
Marketing	We may use your information to contact you about our other research and partnerships, unless you tell us you would prefer not to be contacted in this way using the address below.
Internal controls and processes	We may use personal information to facilitate our internal operations, including assessing and seeking to manage risk as well as fulfilling our legal and regulatory requirements.
Compliance matters	We may use personal information to carry out various compliance checks as required by law, regulation or the Foundation's internal policies and procedures.
Litigation	If we are subject to a court action or other proceedings or require, to the extent necessary, to exercise and defend our legal rights we may be required to use your personal information.
Recording	We may record (visual and audio) and/or monitor communications, (including: cctv, e-mail, instant messaging, facsimile, telephone and other electronic communications), with you or your agent(s) for compliance, internal control and security purposes and as evidence of transactions.
Research	We may use personal information which has been collected from publicly available sources in order to carry out research and to identify potential grant funding opportunities. This could include the personal information of the management or key personnel at an organization

Activity	Details
	that the Foundation is considering funding or otherwise partnering with.

5. When we will disclose information to persons outside the Foundation

The Foundation only discloses your personal information to third parties in accordance with this policy. We may provide your personal information to affiliated or non-affiliated companies that collaborate with us or provide services to us. In a limited range of circumstances, we may disclose your personal information to third parties in accordance with applicable laws and regulations or pursuant to internal policies and procedures designed to facilitate compliance with such laws and regulations. Examples of this would be: when responding to a subpoena or similar legal process; cooperation with law enforcement or regulatory authorities; making enquiries designed to assist with our grant partner identification program; prevent fraud or other financial crime. Affiliated or non-affiliated companies that assist the Foundation in providing services to you are required to maintain the confidentiality of such information and to use it only in the course of providing such services and for the purposes that the Foundation specifies.

These third parties may operate from locations outside the United States ('US'), United Kingdom ('UK') and the European Economic Area ('EEA'). Again, some of these jurisdictions may not have data protection laws as strict as those in your home country. If we transfer your personal information from the US, UK or the EEA to another jurisdiction we will comply with our obligations under applicable law. Please contact us if you would like more information about these transfers.

6. Marketing

The Foundation will not sell, rent or trade your personal information nor will it pass it on to third parties for their marketing purposes without your prior consent.

7. How we protect the privacy of your information

We endeavor to protect your personal information at all times. Primarily, we do this by utilizing appropriate access controls to those data, so that only authorized Foundation employees or agents and our third party service providers have access. We subject such third parties to confidentiality obligations. In addition, we maintain physical, electronic and procedural safeguards intended to protect your information against loss, misuse, damage or modification and unauthorized access or disclosure. Those policies and procedures include educating those working for or on behalf of the Foundation on information security policies and responsibilities.

8. How long will we keep your information?

The Foundation will keep your personal information for as long as we need it for the purposes set out above (see section 4). This means the period for which your personal information is retained will vary depending on your interactions with us. We will also keep information for as long as is necessary to

protect us from a legal claim. Where we no longer have a need to keep your personal information, we will delete it. Please note that where you unsubscribe from our email distribution list, we will keep a record of your details to ensure we do not send you marketing emails in future.

9. What rights do you have under European data protection laws?

You have certain specific rights provided under applicable data protection and privacy laws in respect of your personal information, including the right to access, correct, request the erasure of and obtain a copy of your personal information and in some limited circumstances you may have a right to object to our processing of your personal information. We will deal with any such requests in accordance with applicable law. Please be aware, however, that there are limitations to these rights and there may be circumstances where we are not able to comply with your request. If you wish to exercise one of these rights you can do so by written request to us at the address set out below.

In the case of a request to exercise one of the rights listed above in relation to your personal information you may be asked to supply a valid means of identification as a security precaution to minimize unauthorized disclosure. We will process your request within the time provided by applicable law.

If you have any questions or concerns regarding Foundation's handling of your personal information, you should contact us using the details below. You are also entitled to contact your local governmental authority for data protection and privacy rights.

10. Cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The website of the Foundation utilizes cookies for the purposes of managing our website and to understand and measure its performance. You may delete and block all cookies from this site, but parts of the site will not work.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit www.allaboutcookies.org.

11. Ending your relationship with the Foundation

If your relationship with the Foundation ends, we will continue to treat your personal information, to the extent we retain it, in accordance with this policy as updated from time to time. Please see section 10 above for further details on how long we may retain your personal information.

IMPORTANT INFORMATION ON ELECTRONIC COMMUNICATIONS

1. Confidentiality

When you receive an e-mail or other forms of electronic communication from the Foundation, please be aware the information contained in or accompanying that communication may be confidential, subject to legal privilege, or otherwise protected from disclosure and (unless it expressly states otherwise) it is intended solely for the use of the intended recipient. If you receive a communication from the Foundation and you are not the intended recipient of the communication, please delete it and destroy all copies in your possession, notify us that you have received the communication in error and note that any review or dissemination of, or the taking of any action in reliance on, any such electronic communication sent in error is expressly prohibited.

2. Right to request traditional delivery

If you have requested electronic delivery of any information, you have the right to request paper copies of any information that is sent to you electronically at any time after the consent noted below. No additional fees are charged for requesting paper copies after consenting to electronic delivery and, thereafter, you will receive paper copies.

3. Risk of interception, viruses and defects

Electronic communications may contain computer viruses or other defects, may not be accurately replicated on other systems or may be intercepted, deleted or interfered with without the knowledge of the sender or the intended recipient. The Foundation makes no warranty in relation to these matters. As a result, it may be that you are not comfortable with the risks associated with e-mail messages and other forms of electronic communication. If that is the case, please get in touch with your Foundation contact and we will be pleased to arrange another means of communication with the Foundation.

4. Prohibition on publication and alteration of information

Unless you have the express written consent of the Foundation, you are not permitted to publish, transmit, or otherwise reproduce any information received from the Foundation, in whole or in part, in any format to any third party. In addition, you are not permitted to alter, obscure, or remove any copyright, trademark or any other notices that are provided to you in connection with the information. The Foundation reserves the right, at any time and from time to time, in the interests of its own editorial discretion and business judgement to add to, modify, or remove any of the information delivered to you.

5. The Foundation's rights in respect of information

Unless there is express written agreement with the Foundation to the contrary, no information sent to you is intended to, and will not, transfer or grant any rights in or to that information and all rights not expressly so granted herein are reserved by the Foundation or, if applicable, the third-party providers from whom the Foundation has obtained the information.

6. No warranties made as to content; responsibilities to update

Neither the Foundation nor its third-party providers make any warranty, express or implied, concerning electronic communication. If you elect to receive electronic communications, that is at your sole risk. The Foundation expressly disclaims any implied warranty of satisfactory quality or fitness for a particular purpose, including any warranty as to the use or the results of the use of information with respect to its correctness, quality, accuracy, completeness, reliability, performance, timeliness, or continued availability.

7. Content not to be construed as a solicitation or recommendation

Unless expressly agreed between the parties to the contrary, material provided electronically is for information purposes only without regard to the particular recipient's charitable, personal, business, insurance or investment objectives, financial situation, or means. The Foundation is not soliciting any action based upon it. Any such material is not to be construed as a recommendation, or an offer to buy or sell, or the solicitation of an offer to buy or sell any item, security or financial product in any jurisdiction in which such an offer or solicitation, or business, donation or trading strategy would be illegal. You should neither construe any of the material contained in an electronic communication as

legal, regulatory, tax, or accounting advice nor make information from the Foundation as the basis for any personal, business, charitable or investment decisions made by you or your advisers.

8. No representations made as to other sites or links

Our electronic communications may provide links to certain Internet sites ("Sites") maintained by third parties. In this case, the Foundation is providing such links solely as a convenience to you. Accordingly, the Foundation makes no representations concerning the content of the Sites. The fact that the Foundation has provided a link to the Sites does not constitute an endorsement, authorization, sponsorship, or affiliation by the Foundation with respect to the Sites, their owners, or their providers.

Changes to our policy

This policy provides a general overview of the ways in which we use your personal information and important information on electronic communication. Please be aware that we may request certain further confidentiality arrangements be put in place in respect of your interaction with us, especially when we believe there is a risk such information could be material or sensitive information. This policy may be changed from time to time to reflect changes in our practices concerning the collection and use of personal information, or where required to comply with applicable law. The revised policy will be effective immediately upon posting to our website, so please check this policy periodically for changes.

This version of the Policy is effective from the date cited above.

CONTACT

Sompo Foundation
Attention: General Counsel
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