PRIVACY STATEMENT

Your privacy is important to us and this Privacy Statement ("Statement") provides important information about how ElFlow and its Processors control and/or process personal information. This Statement applies to our products or services (collectively, our "Services").

Please read this Statement carefully and contact our Data Protection Officer if you have any questions about our privacy practices or your personal information rights.

This Statement is effective from January 22nd 2026.

1. Our identity as a Data Controller and contact details

1.1. ElFlow is the controller of all personal data processing undertaken in relation to the legacy accounts of Icarom Plc (formerly Insurance Corporation of Ireland Ltd), PMI Mortgage Insurance Ltd and Groupama UK (Marine Hull & Cargo) ("Groupama"), Preserve Insurance Company Limited, LAMP Insurance Company Limited, Cardinal Re DAC (formerly Mitsui Sumitomo Reinsurance Limited) and certain accounts transferred from Pinnacle Insurance plc.

1.2. ElFlow determines the purposes and means of processing personal data.

1.3. ElFlow does not process personal data.

1.4. Our correspondence address is 5/5 Crutchett's Ramp, Gibraltar GX11 1AA

2. What personal data is processed

2.1. Our Processors process the following personal data:

2.2. Policy holder personal data. Our Processors may process policy holder name, postal address, email address, home telephone number, business telephone number, mobile telephone number, policy number, and other personal data EIFlow considers to be the minimum personal data necessary to service the policies we have issued/underwritten;

2.3. Claimant (or related data subject) personal data. Our Processors may process claimant (or related data subject) name, postal address, email address, home telephone number, business telephone number, mobile telephone number, policy number, claim number and other personal data EIFlow considers to be the minimum personal data necessary to service claims that attach, are reported and/or presented to policies we have issued/underwritten; and

2.4. Service Provider and Business Partner personal data. Our Processors may record name, postal address, email address, business telephone number, mobile telephone number and other personal data EIFlow considers to be the minimum personal data necessary to maintain contact with companies and/or individuals that provide a service to us or for which there is a business relationship.

3. The source(s) of the personal data

3.1. Policy holder personal data. Our Processors may receive policy holder personal data from policy holders when they complete a proposal for insurance or from insurance or reinsurance companies that we reinsure;

3.2. Claimant (or related data subject) personal data. Our Processors may receive Claimant (or related data subject) personal data from policy holders; claimants, legal representatives, insurance or reinsurance companies when a claim is advised, reported or presented; and

3.3. Service Provider and Business Partner personal data. Our Processors may receive personal data from companies and/or individuals that provide a service to us or for which there is a business relationship at the commencement or continuation of the relationship.

4. The purpose(s) of the personal data we process and legality

4.1. Our Processors process the following types of personal data, based on the stated legality:

4.2. Policy holder personal data: our legality for processing policy holder data is our legitimate interest as an insurer (or reinsurer) to adequately service insurance (or reinsurance) policies we have issued/underwritten;

4.3. Claimant (or related data subject) personal data: our legality for processing claimant (or related data subject) data is our legitimate interest as an insurer (or reinsurer) to adequately service insurance (or reinsurance) claims that attach, are reported and/or presented to policies we have issued/underwritten; and

4.4. Service Provider and Business Partner personal data: our legality for processing such data is our legitimate interest in maintaining contact with companies and/or individuals that provide a service to us or for which there is a business relationship.

5. Who our processors are

5.1. EIFlow has entered into service agreements with the following companies:

Name	Service provision	Website address
Bowline Quantum Solutions Ltd	Recoveries	https://www.bowlinerisk.com/
Horwich Farrelly	Solicitors	https://www.h-f.co.uk/
Kennedys	Solicitors	https://www.kennedyslaw.com/en/
Quest Consulting (London) Ltd	Policy & Claim Administration	https://quest-group.co.uk/
Walsham Brothers	Broker services	https://walshams.co.uk/
Wessex Group	Policy & Claim Administration	https://www.wessex-group.co.uk/

EIFlow takes no responsibility for content displayed on our processor websites.

6. Personal data security and confidentiality

6.1. Security and confidentiality of personal data is important to us and our Processors.

6.2. Our Processors:

- Only use appropriate technologies and procedures to protect the security and confidentiality of personal information.
- Have information technology ('IT') policies and procedures aligned with widely accepted international standards and are reviewed regularly and updated as necessary to meet our business needs, changes in technology, and regulatory requirements.

7. The disclosure of personal data to third parties

7.1. We/our Processors will only disclose personal data to the following third parties:

- Processors that we contract with to provide policy holder and/or claimant services;
- Our auditor(s);

- Regulatory or Supervisory Authorities;
- Upon the order of a court of competent jurisdiction;
- Entities who may be involved in a merger, sale, restructure, acquisition, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

7.2. EIFlow will only disclose personal data where the third party (other than Regulatory or Supervisory Authorities and Courts of competent jurisdiction) has provided a written undertaking to:

- Apply at least the same restrictions that EIFlow apply on access to and security of such data;
- Maintain the confidentiality of such data; and
- Only use the personal data for the purpose for which it was disclosed.

8. Personal data retention period

8.1. Our Processors will process policy holder or claimant personal data only for as long as it is necessary to service insurance (or reinsurance) policies we have issued/underwritten and any claims that attach, are reported and/or presented thereunder.

8.2. Our Processors may also process such personal data after this period but only where required to meet our legal or regulatory obligations.

8.3. Our Processors will process service provider and business partner contact details for as long as the relationship with the provider or partner exists or as we consider appropriate.

Individual's data protection rights

8.4. If you reside in the European Union, you have the right under the General Data Protection Regulation to request access to and rectification or erasure of your personal data, data portability, restriction of processing of your personal data, the right to object to processing of your personal data, and the right to lodge a complaint with a Supervisory Authority. If you reside outside of the European Union, you may have similar rights under your local laws.

8.5. To request access to or rectification, portability or erasure of your personal data contact our Data Protection Officer, contact details are provided in section 9.

9. Our Data Protection Officer contact details;

9.1. Ian Blackshire, Group Data Protection Officer.

9.2. Correspondence address: Quest Group, 52-54 Gracechurch, London EC3V 0EH.

9.3. Email address: iblackshire@quest-group.co.uk

10. Data protection Supervisory Authority contact details

10.1 Correspondence address: Information Commissioner's Office, Wycliffe House, Wate Lane, Wilmslow, Cheshire SK9 5AF.

10.2. Telephone: +44 (0)303 123 1113.