



TOKIO MARINE
KILN

Product Information Exchange Document

Commercial Cyber –
Data Protection & Network Interruption

Empowered Expertise

Contents

Definitions	3
Guidance	3
Product Information Exchange Document (PIED)	4

Definitions

Manufacturer: The term Manufacturer refers to a firm substantially involved in creating, developing, designing and/or underwriting a contract of insurance. As such, managing agents/insurance companies will always be product manufacturers. They may be co-manufacturers with a Distributor when the Distributor also meets the definition.

Distributor: Generally, a Distributor will be some form of intermediary, either authorised or exempt by the FCA. A Distributor would also include introducers.

Commission: Commission paid for the product. Do not include any commission whereby the carrier is already in possession of the data including, but not limited to, additional commission such as work transfer or any other commissions.

Fees: Whereby an additional fee is paid above the policy level commission by a client such as an administration fee. A finite figure should be provided e.g. £15 administration fee or administration fee ranging from £10-15. Do not include fees that are paid in lieu of commission and agreed with customers. Fees whereby a carrier provides a net quote should not be included.

Reasonable steps: The definition of reasonable steps depends on a distributor's risk appetite but should be sufficient for the distributor to discharge their regulatory obligations.

Ancillary product: An ancillary product is a product that is not sold in isolation, is offered by the same carrier and where the cost is included as part of the core premium. Where an ancillary product is sold alongside a core product but has a separate premium this should not be included. Premium finance will either be dealt with under the Distributor section or Carrier section depending on which party is responsible for the arrangements.

Required information: The required information is the information needed for the manufacturer to complete a fair value assessment and is limited to the information outlined in the checklist.

Guidance

To add value for the Carrier, data reported should not be that which the Carrier already holds, e.g. total commission.

Where there is distribution via more than one legal entity in the same group, the commissions and services should be split according to legal entity.

Information on remuneration should relate to those charged in connection with the specific product(s).

It is recognised that there may be limitations on the data that distributors can provide, particularly where there are non-UK distributors in the chain due to local legal restrictions, type of distribution chain, etc. Therefore, it is accepted that Distributor 1 will provide the data after taking reasonable steps to obtain full information. Where not all information is available, Distributor 1 should assist the Carrier by providing an explanation as to the limitations on the information available.

Where a Distributor distributes the same product from the same Carrier to multiple Distributors, it may be prudent to ask for a confirmation from the multiple distributors that their fees are not more than a certain amount, rather than requesting numerical data.

Product Information Exchange Document (PIED)

Carrier name	Tokio Marine Kiln
Broker name	Various
Product name	Commercial Cyber: Data Protection & Network Interruption
Reference/UMR [Binder]	Various
Reference [Class of Business]	Enterprise Risk
Date	April 2026

Manufacturer Information	
Product information	
<p>The Commercial Cyber insurance product is a commercial insurance product suitable for businesses of all sizes, including micro-enterprises, Small Businesses, and other larger entities, wishing to insure against cyber-related liabilities including business interruption, destruction of digital assets and data, reputational harm, cyber extortion, incident response expenses and other core coverages (social engineering, crime, cyber physical damage etc).</p> <p>Core Covers (can include but are not limited to):</p> <ul style="list-style-type: none"> • Business Interruption Financial loss arising from privacy breach, security breach, administrative error or power failure impacting the insured’s computer system. • Contingent Business Interruption Financial arising from privacy breach, security breach or administrative error impacting the insured’s outsource service providers computer system. • Digital Asset Destruction of data, computer programs and electronic documents incurred as a direct result of a privacy breach, security breach, administrative error or power failure. • Reputational Harm Financial loss and crisis management costs incurred as a result of an adverse media event arising from a privacy breach, security breach or administrative error. • Cyber Extortion expenses and ransom demand payments to avoid a privacy or security breach incurred directly as a result of a cyber extortion threat. • Incident Response Expenses incurred as a result of a privacy breach or security breach. • Loss of Funds incurred directly as a result of a hack of the insured’s computer System. • Physical Damage following cyber-attack • Cyber Crime / Social Engineering • Non-Tech Contingent Business Interruption • Incident Response (outside of the limit) • Defence Costs (outside of the limit) 	
Target market	
<p>The Commercial Cyber – Data Protection & Network Interruption product is designed for businesses seeking protection against cyber-related risks, including data breaches, and operational disruption. It provides comprehensive coverage and additional services to help mitigate and respond to cyber incidents.</p> <p>Key characteristics include:</p> <p>(1) Business Size & Type:</p> <ul style="list-style-type: none"> - Micro enterprises, small businesses, mid-sized commercial entities, and large commercial organisations across multiple sectors. - Suitable for businesses that rely on digital infrastructure and hold sensitive data, making them vulnerable to cyber threats. <p>(2) Insurance Profile:</p> <ul style="list-style-type: none"> - Customers who purchase commercial insurance through brokers, including those with property or liability policies where cyber cover may be embedded or offered as an additional extension of cover. - The product can be sold as a standalone policy or as an add-on to another commercial insurance. 	


(3) Customer Needs & Behaviours:

- Businesses concerned about financial, operational, and reputational impacts of cyber incidents.
- Likely to value proactive risk management tools and expert support during and after an incident, including:
 - (a) 24/7 breach response hotline and triage services.
 - (b) Access to cyber security tools such as phishing simulations, inbox protection, and vulnerability scanning
 - (c) Guidance and coordination of specialist resources (IT forensics, legal support) during a cyber event.

(4) Geographic Scope:

- Distributed in the USA, Canada, UK, EEA, Australia/New Zealand, and other licensed jurisdictions globally.

(5) Distribution Channel:

- Sold via insurance brokers through both advised and non-advised processes, ensuring suitability checks even when advice is not provided.
- Distributed through coverholders, lineslips, open market placements, and group/master policy arrangements.

(6) Circumstances Where Product Delivers Greatest Value:

- Following cyber incidents such as ransomware attacks, data breaches, or system outages where rapid response and financial protection are critical.
- Businesses lacking in-house cyber expertise and requiring external support for incident management and regulatory compliance.

This product appeals to organisations seeking peace of mind, operational resilience, and expert-led incident response, particularly those exposed to increasing cyber threats and regulatory scrutiny.

Types of customer for whom the product would be unsuitable

The Commercial Cyber product would not be appropriate for:

(1) Individuals or Personal Lines Customers

- The product is designed exclusively for commercial entities and does not provide cover for personal cyber risks.

(2) Businesses Without Meaningful Cyber Exposure

- Organisations that do not rely on digital systems, store sensitive data, or conduct online transactions, as they have negligible exposure to cyber threats.

(3) Entities Seeking Direct Purchase Without a Broker

- Customers who wish to buy insurance directly without engaging a regulated insurance broker, as the product is distributed through broker-led channels to ensure suitability and compliance.

(4) Organisations Domiciled Outside Licensed Jurisdictions

- Businesses domiciled in regions where TMK/Lloyd's does not hold a license to operate.

Any notable exclusions or circumstances where the product will not respond
Limitations:

- Any incurred loss during the waiting period as stated in the schedule will be uninsured.
- Incidents to be reported as soon as reasonably practicable.
- Insured to not make and payments, assume any obligations, incur expenses, enter onto any settlement without TMKS written consent.
- Accurate and complete information must be supplied as requested.

Amounts which the Insured is legally obliged to pay:

- Security and Privacy Liability damages and defence costs as a result of a claim arising from a security breach or privacy breach.
- Regulatory Fines and Penalties and defence expenses as a result of a claim arising from a Security Breach or Privacy Breach.

- Multimedia Liability damages and defence expenses as a result of a claim arising from multimedia activities.
- Payment Card Industry Fines, Assessments and Expenses as a result of a Claim arising from a Security Breach or Privacy Breach.

Exclusions include but not limited to:

- Bodily injury
- Betterment
- Breach of contract, warranty, guarantee or promise and assumed liability.
- Loss of funds
- Terrorism
- Use of illegal or unlicensed programs or software
- War or uprising
- Insured misconduct

Limits of Liability:

- Stated in the schedule.

Retention Amount

- Stated in the schedule.

Other information which may be relevant to distributors

This product is permitted for sale with up to 4 distributors in the chain e.g.

- Lloyd's Broker;
- A delegated authority arrangement with a coverholder
- Wholesale broker;
- Retail/ producing broker.

No further distributors in the chain are permitted without TMKS' approval. Any such approval will include consideration of their impact on product value.

This product can be sold with or without advice in line with FCA regulations or local regulations if distributor is not regulated by the FCA.

All distributors are expected to fully understand the eligibility criteria, covers and exclusions of the product.

Sales journeys must identify customer eligibility and ensure that key information and choices to be made are presented to customers in a way that supports a customer through the process of understanding core cover and configuring optional elements of insurance to suit their specific demands and needs.

This product can be sold face to face, via telephone, online rating engine or electronic communication or a mix of these methods, as long as customers are provided with sufficient information to make an informed decision regarding the suitability of the product.

Where Distributor 1 sells this Product via multiple other distributors (via sub-delegation or sub-broking), it is their responsibility to ensure all distributors have been provided this document, have reviewed it and understand the content. If there is any additional remuneration, including commissions, fees or other 'non-standard' remuneration charged to the customer by other distributors, it is the responsibility of Distributor 1 to inform TMK of these details accurately and in full.

Commission & Fees

If there is a coverholder in the chain, they are expected to ensure that maximum commission rates do not exceed those stipulated within the Binding Authority Agreement.



<p>The coverholder is expected to maintain oversight of all broker commissions (where applicable) and, where there may be a risk to product value, remedial action should be taken immediately including notification to Tokio Marine Kiln.</p> <p>Brokers are reminded of their own regulatory obligations in relation to remuneration under PROD 4.3.6 as well as the requirements to make all necessary disclosures to the customer.</p> <p>Where there are any fees charged by any member of the distribution chain these should be:</p> <ul style="list-style-type: none"> • commensurate with the service provided by the distribution. • not have an adverse impact on customer value; and • distributor should ensure that TMKS is made aware of the fee amount and/ or method of calculation. <p>Fees of up to £100 per policy can be charged by the producing broker.</p> <p><u>How value is assessed</u></p> <p>Value is assessed based on a number of metrics, including underwriting, claims and complaints information as well as through broker and coverholder engagement.</p> <p>Remuneration paid as set out in our agreements with distributors has been considered as part of the product review.</p> <p>If additional add-ons (including premium finance) are sold alongside this product or additional remuneration is charged, this may affect the value for the customer.</p> <p>Further information on our product approval processes can be obtained on request.</p>	
Date Product Review completed	April 2026
Expected date of next assessment	April 2027