

**TRANSATLANTIC HOLDINGS, INC.**

**GLOBAL REINSURANCE PRIVACY and DATA PROTECTION  
POLICY**

**What We Do**

Transatlantic Holdings, Inc., its subsidiaries, branches and affiliates (collectively referred to as “TransRe”), recognize the importance of effective and meaningful privacy protections when it collects, uses, and discloses Personal Information.

We are in the business of providing reinsurance to insurance companies. In providing reinsurance services to meet the needs of our business partners we collect information from them about their insureds to both underwrite reinsurance policies and to settle related claims. We work extensively with reinsurance brokers whose role is to help connect insurance companies with reinsurers for added reinsurance coverage to meet their insurance needs.

As part of our business model we make an ongoing effort to safeguard and protect nonpublic information whether it is nonpublic personal information, personally identifiable information, personal health information or confidential business information. The information of our business partners and employees is very important to us -we do not sell confidential business or personally identifiable information. We only use, disclose, or share personal or confidential business information for business purposes as described in this policy. This policy applies to all TransRe business entities, brands and operations globally, including joint ventures and partnerships, to TransRe.com, and to TransRe subsidiary websites.

**What Data Do We Collect?**

We collect information when a business partner applies for a reinsurance policy. This generally includes company name, address and other relevant underwriting application information that is provided to us. Application and limited claim information is used to evaluate underwriting risk, to formulate policy and pricing terms, and to assist in claims handling. Some of the information collected may, from time to time, depending on the business requirements, fall into what is deemed “Personal Information” (“PI”) or “Nonpublic Personal Information” (“NPI”) which is data that identifies or has the potential to directly or indirectly identify a person taken alone or in combination with other information. Such data may include an individual’s name, address, Social Security number, e-mail address, date of birth, or financial account numbers. We also safeguard confidential business information that is provided to us by our business partners such as insurance companies and insurance brokers as to their own insurance business practices

and related losses when pertinent. At the end of the underwriting application process we are required by our regulators to also retain applicant information for five (5) years even if the application is denied.

In working with our insureds in the underwriting process we may collect information about their business(es) relevant to policy requirements and coverage, risks associated with it and such things as pricing, claim history, and license status. We may also ask for information concerning past claims by patients, clients or licensing bodies. In the event of a claim or anticipated claim, we collect related claim information to help evaluate and complete the claims process. This may include information as to the nature of the claim, the parties involved, and documentation to support the underlying claim.

In some instances claim information may be medical or health-related information, also referred to as Protected Health Information (“PHI”), which is regulated and protected under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”). As such, whether it is PHI claim information or Nonpublic Personal Information (“NPI”) or Personally Identifiable Information (“PII”), it is information that may be regulated and protected by Health Insurance Portability and Accountability Act (“HIPAA”), the New York Department of Financial Services (“NY DFS”), the Fair Credit Reporting Act (“FCRA) or other Global or U.S. Privacy and Information Security Laws.

### **Website Specific Data**

One area in which we may also collect information differently than from the underwriting process is the TransRe website (the “Website”). We may collect Personal Information if it is submitted through the Website. Website information may also be collected automatically through the use of cookies, web beacons, web server logs and other means, as described below. This information may include usage data, such as the number of unique visitors, what pages are visited most often, and the navigation preferences and characteristics of web visitors.

### **Website COOKIES**

Websites use cookies for various reasons. We may use cookies to tell us whether anyone has ever visited our Website before or if they are a new visitor, and to help us understand what areas of the Website are found most interesting. Cookies may enhance Website experience by saving preferences and passwords so not to have to re-enter information each time visiting the Website. Cookies however are not used to identify or to collect Personal Information.

Cookies may be accepted or declined. While most Web browsers automatically accept cookies, browser settings can be modified to decline cookies. However, disabled cookies may limit the advantage of using all Website features.

### **Web Beacons**

Web beacons may also be used which are transparent pixel images that are used to collect information about Website usage, email response and tracking.

### **Web Server Logs**

Certain information is gathered automatically and stored in web server logs for various reasons including administering the site, analyzing trends and tracking usage. This information does not identify individual users. This information may include the following: Internet protocol (IP) address; type of browser, computer and operating system, browser plug-ins, height and width, Internet Service Provider (ISP), search engines, and keywords used to find our site; pages viewed within our site; city, state or country from which our site was accessed, Web pages linked to our site from, date and time of visit, pages viewed on our site and other clickstream data.

This site may use Google analytics, a website analytics service provided by Google, Inc. Google Analytics uses cookies to help Website owners understand how visitors interact with the Website. Google uses this information to evaluate your use of the Website, compile reports for website operators and provide other services related to website activity and internet usage. You may view the Google privacy policy at <http://www.google.com/intl/en/analytics/privacyoverview.html>

The Website is not directed to and will not knowingly collect Personal Information from children under the age of thirteen (13) without their parents' consent.

### **Who Sees This Data**

TransRe application or other business information may be shared with business contacts such as program administrators, managing general agents, insurance brokers, actuaries, accountants, reinsurers and reinsurance brokers, application or IT services providers, and legal counsel to facilitate TransRe business objectives. Regulators may also view application or other business information in carrying out their regulatory or legal duties. Other information may be used in for routine business activities, including evaluating and underwriting policies, auditing, establishing pricing and other underwriting criteria, evaluating, processing, paying or rejecting claims, and other purposes authorized by law.

We may also share personal information with other companies or individuals outside of TransRe for the following limited purposes: (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms of Service, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against imminent harm to the rights, property or safety of its users, or the public as required or permitted by law.

If TransRe becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, it will provide notice before personal information is transferred and subject to a new privacy policy different from this policy. We may also from time to time use or share aggregated or de-identified nonpublic business or personal information for business purposes with business partners.

### **Information Security**

TransRe uses information security policies that are designed to protect and secure the confidentiality and integrity of its business data whether it is nonpublic personal information, protected health information or confidential business information. And, although administrative, technical and physical safeguards are in place, important regulatory concerns surround the secure use of the Internet, unforeseen system vulnerabilities, social engineering risks and the possibility of third-party negligence or malfeasance. These added risks are why TransRe cannot guarantee that information will always remain absolutely confidential at all times.

So as noted even though we take precautions to secure our business partner's information and apply commercially reasonable and appropriate safeguards we cannot guarantee information cybersecurity. To the extent you or others in your company access information on TransRe systems through the use of a password, we ask that you keep your password confidential and secure because we cannot be responsible for acts resulting from the unauthorized use of your password or compromises to the security of your computers, networks or systems.

### **Data Collection Principle Based Practices**

TransRe adheres to US and EU Data Protection principles as well as other applicable data protection regulations that apply to TransRe's global business operations. We extend these practices to our business partner data collection procedures worldwide except where local requirements warrant modification or where adherence may be limited in order to comply with law enforcement, public, interest or national security. The following principles are part of TransRe's privacy and information cyber security business practices:

**Fair Use** - We collect, use or disclose Personal Information by lawful, fair, open and transparent means in accordance with applicable laws in observation of the legal rights of individuals.

**Notice** - Due to the nature of our reinsurance business our business partners provide their privacy policy to their insureds and we rely on their having provided such notice. For our subsidiaries that offer direct insurance we provide a privacy data usage notice to our insureds through agents and post the notice on our website. TransRe, as mentioned previously in this statement, does not sell Personal Information to third parties nor does it share Personal

Information with third parties except for legitimate business purposes or when required to by law.

**Choice** - When Personal Information is collected by TransRe's business partners and then transferred to TransRe we again rely on our business partners to have obtained the necessary consent. If TransRe is dealing directly with individuals for some reason in a separate legal relationship it provides sufficient information to allow the individual to make an informed decision and allows them to later withdraw their consent if not prohibited by other overriding legal requirements.

TransRe uses Personal Information in accordance with the purpose for which it was first collected and for ongoing related legitimate business purposes. TransRe obtains new explicit consent if the data is to be used for new or other purposes than those covered by the initial consent. In circumstances where we are directly collecting Sensitive Personal Information we obtain explicit affirmative express consent by the Individual for use, retention, access, collection or sharing.

**Integrity** - TransRe takes reasonable steps to ensure that Personal Information collected, used or disclosed is accurate, up-to-date, complete, reliable and relevant to the purposes for which it is used or disclosed.

TransRe limits the collection of Personal Information to that which is relevant and purposeful to the reason collected. TransRe again only uses Personal Information in accordance with its original purpose and obtains prior explicit consent for new uses not covered by the relevant privacy notice.

TransRe retains Personal Information for as long as reasonably required to serve TransRe's legitimate business needs. Personal Information that is no longer needed for business purposes is deleted, destroyed or at times anonymized if retained.

**Access and Correction** – Upon written request, Individuals may access Personal Information in TransRe's possession unless such access would be inappropriate. In the event an individual establishes that their Personal Information is inaccurate or incorrect, TransRe will endeavor to promptly correct the Personal Information.

**Security** – TransRe takes reasonable precautions designed to protect Personal Information under its control or in its possession against loss, theft, misuse, unauthorized access, disclosure, modification, alteration or destruction. These precautions include administrative, technical, physical and organizational measures appropriate to the risks and are designed to include such things as password protections, encryption and access control. (See Information Security section above)

**Third Parties** - TransRe Personal Information that is accessed by, or shared with, third-parties, requires that third parties expressly contract in writing that they provide the same or similar data protection, confidentiality and security standards as TransRe.

**Training and Compliance** - TransRe provides training to employees on how to appropriately collect, use or access Personal Information. Employee training and education is provided on an ongoing basis to ensure employees regularly learn how to use and secure Personal Information. Amendments to this Policy will be effective when published to employees on TransRe's PolicyHub policy management portal or to the TransRe website.

### **Transfer of Information to the United States**

TransRe is an international reinsurance organization headquartered in the United States with operations worldwide. Our Website is operated in the United States and intended for users located in the United States. If you are located outside of the United States, please be aware that information we collect directly from you or that we receive indirectly from our clients or other third parties, including Personal Information, will be transferred to, and processed, stored and used in the United States. The data protection laws in the United States may differ from those of the country in which you are located, and your Personal Information may be subject to access requests from governments, courts, or law enforcement in the United States according to laws of the United States. For information we receive indirectly (e.g. from clients), contract terms define our protection standards. When you provide information directly TransRe or use our Website you consent to the transfer to, and processing, usage, sharing and storage of your information, including Personal Information, in the United States as set forth in this Privacy Policy.

### **Changes to Our Privacy Policy**

If material changes are made to our Privacy Policy we will post them to the privacy policy section of our website. If you have any questions about this Policy, please feel free to contact us through our website's contact page or at the address below.

### **How You Can Contact Us**

If you have any questions or concerns about this Privacy Statement, please email us at [Privacy@TransRe.com](mailto:Privacy@TransRe.com) or by contacting the person listed below.

Regan Adams  
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