

**TRANSRE GROUP OF COMPANIES
GLOBAL PRIVACY NOTICE**

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TRANSRE GROUP OF COMPANIES GLOBAL PRIVACY NOTICE

This Privacy Notice was last updated January 26, 2023.

The purpose of this Privacy Notice is to explain how and why personal information is collected, used, and shared by TransRe. If you have any questions or would like more information, please contact us using the details provided in Section 16 below.

1. Introduction

Transatlantic Holdings, Inc., its subsidiaries, branches, and affiliates (collectively referred to as “**TransRe**”), recognizes the importance of effective and meaningful privacy protections when it collects, uses, and shares personal information.

We are in the business of providing reinsurance to insurance companies. Certain TransRe subsidiaries provide insurance to companies and individuals. In providing (re)insurance services to meet the needs of our business partners, we collect personal information from them about their insureds to both underwrite (re)insurance policies and to settle related claims. We work extensively with (re)insurance brokers whose role is to help connect companies with insurers and insurance companies with reinsurers to meet their (re)insurance needs. We also work with retrocessionaires and reinsurance related investment companies providing reinsurance related services to the insurance and reinsurance industry.

TransRe is the controller of your personal information that is processed under this Privacy Notice.

Except as identified below, this Privacy Notice covers all of the companies in the TransRe group, including the following:

- Transatlantic Holdings, Inc. Delaware, USA
- Transatlantic Reinsurance Company, New York, USA, including its branches worldwide
- TransRe London Limited, United Kingdom
- TransRe London Services Limited, United Kingdom
- TransRe Europe SA, Luxembourg, including its branches in France, Germany and Switzerland

If you are a policyholder of Calpe Insurance Company Limited (“**Calpe**”), or are insured under, or have made a claim in connection with, a policy issued by Calpe, please refer to the Calpe Privacy Notice available at <https://www.transre.com/legal/>.

If you are a policyholder of Fair American Insurance and Reinsurance Company (“**FAIRCO**”) and Fair American Select Insurance Company (“**FASIC**”), please refer to FAIRCO Privacy & Security Notice at <https://www.fairco.com/legal-information/privacy-and-security/>.

2. Personal information we collect and where we collect it from

So that we can operate our business, provide (re)insurance quotes, underwrite and bind (re)insurance policies and deal with claims or complaints, we collect and process personal information.

The types of personal information that we collect and process may include:

Category	Examples of personal information collected
Individual details	Name, address, e-mail address, date of birth.
Identification details	Identification numbers issued by government bodies or agencies.
Credit, fraud prevention, and sanctions related information	Credit and fraud prevention information such as credit history, credit score, criminal offences, bank account information, information from various fraud prevention databases and information from sanctions lists, insofar it is permitted under applicable laws.
Special or sensitive categories of personal information	Certain categories of personal information which have additional protection under applicable data protection laws or are otherwise considered sensitive. This may be information relating to your health (including Protected Health Information, physical and mental health conditions), genetic or biometric data, sex life, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, as well as information relating to criminal convictions including data about offences, court sentences or unspent criminal convictions, insofar it is permitted under applicable laws.
Claims information	Information about previous and current claims, (including other unrelated insurances), which may include information relating to your health (e.g., injuries and relevant pre-existing conditions), relevant social networks activity, relevant criminal convictions, or other special categories of personal information, insofar it is permitted under applicable laws.
Risk details	Information about you which we need to collect in order to quote, underwrite and bind (re)insurance business and for related risk management and reporting purposes. This may include information relating to your health, relevant criminal convictions, or other special or sensitive categories of personal information, insofar it is permitted under applicable laws.

Sources where we may collect information may include:

Our business partners	Information that is provided to us by third parties who provide (re)insurance or (re)insurance-related services, for example (re)insurance companies, brokers, loss adjusters, claims administrators, legal advisers, assistance providers, experts and, in limited circumstances, private investigators or fraud investigators.
Communications with us	Information that you provide or that we collect when you communicate with us.
Surveys	Information that you provide in connection with surveys you participate in.
Conferences, trade shows, and other events	Information that you provide to us or that we collect when we attend conferences, trade shows, and other events.
Business development and strategic partnerships	Information we collect from individuals and third parties to assess and pursue potential business opportunities.

Information we collect automatically. We may collect certain information automatically when you visit our website or other online services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our website or other online services, such as pages that you visit before, during and after using our services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our services.

Cookies, pixel tags/web beacons, and other technologies. We, as well as third parties that provide content, advertising, or other functionality on our website and other online services, may use cookies, pixel tags, local storage, and other technologies (“**Technologies**”) to automatically collect information through your use of our online services.

- Cookies. Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
- Pixel tags/web beacons. A pixel tag (also known as a web beacon) is a piece of code embedded in our online services that collects information about engagement on our Services. The use of a pixel tag allows for tracking when a user has visited a particular web page or clicked on a particular advertisement. Web beacons can also be used in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our use of these Technologies fall into the following general categories:

- Operationally necessary. This includes Technologies that allow you access to our online services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity and improve security or that allow you to make use of our functionality .
- Performance related. We may use Technologies to assess the performance of our online services, including as part of our analytic practices to help us understand how individuals use our services (see Analytics below).
- Functionality related. We may use Technologies that allow us to offer you enhanced functionality when accessing or using our online services. This may include identifying you when you sign into our services or keeping track of your specified preferences, interests, or past items viewed .
- Advertising or targeting related. We may use first party or third-party Technologies to deliver content, including ads relevant to your interests, on our online services or on third-party websites.

See “Your Choices” below to understand your choices regarding these Technologies.

Analytics. We may use Technologies and other third-party tools to process analytics information on our website and other online services. Some of our analytics partners include:

- Google analytics. For more information, please visit [Google Analytics' Privacy Policy](#). To learn more about how to opt-out of Google Analytics' use of your information, please click [here](#).

Personal information collected from other sources. TransRe may obtain information about you from other third-party sources including, but not limited to commercially available third-party sources.

3. How we use personal information and our legal basis for doing so

TransRe may use personal information in a variety of ways, including:

Basis	Description
Performance of a contract	<p>TransRe may need to process personal information for the purposes of underwriting, evaluating risk, and servicing claims pursuant to contracts with our business partners and to take steps prior to entering into a contract. This includes using personal information for:</p> <ul style="list-style-type: none"> • policy issuance and administration; • claims processing and risk modeling and analytics; • renewals; and • enforcing our agreements and policies.
Compliance with legal and regulatory obligations	<p>TransRe processes personal information where it is necessary to comply with our legal and regulatory obligations.</p>
Legitimate interests	<p>Carrying on (re)insurance business. TransRe may need to process personal information for the purposes of underwriting, evaluating risk, and servicing claims pursuant to contracts with our business partners and to take steps prior to entering into a contract. This includes using personal information for:</p> <ul style="list-style-type: none"> • policy issuance and administration; • claims processing and risk modeling and analytics; • renewals; and • enforcing our agreements and policies. <p>Interest in managing our business. TransRe may use personal information for managing its business, including, without limitation, to: (a) perform internal quality control; (b) verify identity; (c) send communications regarding our website, programs or services, customer accounts, or any changes to any policy or terms of service; (d) process payments; (e) prevent potentially prohibited or illegal activities; and (f) enforce our agreements.</p> <p>Research and development. TransRe may use personal information to help us to optimize and improve our existing products and services and to develop new products and services, including using data to build, train and audit automated tools developed by us or our business partners in connection with our (re)insurance business.</p> <p>Disclosing personal information to affiliated organizations. TransRe processes personal information for the purposes of (re)insurance and disclosing business, reporting, financial and audit information with its affiliated organizations.</p> <p>Direct marketing and advertisement. TransRe may use personal information to tailor and provide materials about offers, products and services offered by us, including new content or services on TransRe's websites on a business-to-business (B2B) basis. TransRe may provide these materials by phone, postal mail, facsimile, email, or as otherwise permitted by applicable law. To opt out of the use of personal information</p>

Basis	Description
	<p>for such purposes, please contact TransRe as further described below.</p> <p>Physical security, IT and network security. TransRe processes Personal Data for the purposes of physical security, IT and network security. It is in our legitimate interest to process your personal information for appropriate administration, maintenance and security of our systems and information.</p> <p>Where we rely on legitimate interests as our lawful basis, we are required to carry out a balancing test to ensure that our interests, or those of a third party, do not override the rights and freedoms that you have as an individual. We have considered the purposes for which we use your personal information and the necessity of doing so, as well as the nature of the personal information we use, your reasonable expectations of us and the likely impact that our use, and non-use, of that information could have.</p> <p>We may generate de-identified and/or aggregated information that cannot be used to re-identify individuals based on personal information we process. De-identified and/or aggregated information is not personal information and we may use, disclose, and retain such information as permitted by applicable laws.</p>
Consent	<p>TransRe may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent. Where our processing of personal information is based on your consent, you may withdraw your consent to such processing at any time. If you withdraw your consent, we will no longer process your data for that purpose.</p>
Otherwise permitted by law	<p>TransRe may process your personal information as otherwise permitted by applicable law.</p>

We may process **special categories of personal information** (for example, your medical or health-related information) where:

- it is necessary for reasons of substantial public interest on the basis of law;
- for (re)insurance purposes where it is permitted by law, including advising on, arranging, underwriting or administering a (re)insurance contract, administering a claim under a (re)insurance contract, risk management and modeling, or exercising a right, or complying with an obligation, arising in connection with a (re)insurance contract, including a right or obligation arising under an enactment or rule of law;
- you have given us or our business partners your explicit consent (you may withdraw your consent to such processing at any time. If you withdraw your consent, we will no longer process your data for that purpose);
- the processing is necessary to protect your, or another's, vital interest;
- the processing is necessary for the establishment, exercise or defense of legal claims;
- you have manifestly made your personal information publicly available; or
- it is otherwise permitted by applicable law.

Please note that in some cases, TransRe’s customers/business partners may also be controllers of your personal information in their own right. In these cases, if you have any questions or concerns about how personal information is handled or if you would like to exercise your rights, we may redirect you to contact the person or entity (i.e., the data controller or business) who has contracted with us.

4. Who we share personal information with

So that we can effectively operate our business and comply with legal obligations imposed on us, we may from time to time disclose your personal information to third parties, including without limitation to the following:

- with business contacts such as program administrators, managing general agents, (re)insurers and (re)insurance brokers, actuaries, accountants, application or IT services providers, vendors, and legal counsel to facilitate TransRe business objectives.
- with regulators who may view application or other business information in carrying out their regulatory or legal duties.
- with third parties 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.
- with third parties for the following limited purposes: (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms of Service, contracts, or policies, including investigation of potential violations or breaches 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 TransRe, third parties, or the public as required or permitted by law.
- with third-party advertising partners that help us advertise to you. These third-party advertising partners may set Technologies and other tracking tools on our websites and other online services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as “interest-based advertising” or “personalized advertising.”
- with third parties, to the extent TransRe is involved in a merger, acquisition, or any form of sale of some or all of its assets, the information we hold may be sold or transferred as part of such a transaction, as permitted by law and/or contract. In such cases, TransRe will provide notice before Personal Information is transferred and subject to a new privacy policy different from this policy.

5. International transfers of personal information

The personal information we collect may be transferred to and stored anywhere in the world. For example, your personal information may be disclosed to TransRe companies in the United States of America. The law of those countries may not provide an adequate level of protection in relation to processing your personal information, as determined by the relevant supervisory authority in your territory.

Where required by applicable law, we take steps to ensure that appropriate legal measures are in place which are designed to ensure that an adequate level of data protection is afforded to personal information that is transferred internationally. Some of the measures we use may include:

- Standard Contractual Clauses: standard clauses in our contracts with our subsidiaries, affiliates, and other third parties to ensure that any personal information leaving Gibraltar, Switzerland, the UK and/or

the EEA will be transferred and subsequently processed in a manner consistent with the requirements of applicable data protection laws. Copies of our current Standard Contractual Clauses are available on request by using the contact details listed in Section 16 below.

6. How long we hold personal information

We store the personal information we collect as described in this Privacy Notice for as long as necessary to fulfill the purpose(s) for which it was collected, provide our products and services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, comply with applicable laws and in keeping with our global retention policy. For example, at the end of the underwriting application process we are required by one of our regulators to retain applicant information for a minimum of five (5) years even if the application is denied.

7. Your rights

In accordance with applicable laws, you may have the right to:

- be informed about how we process your personal information;
- access a copy of your personal information held by us;
- request rectification of your personal information if it is inaccurate or incomplete;
- request erasure of your personal information in certain circumstances;
- restrict our use of your personal information in certain circumstances;
- move (or port) personal information which you have given us to process on the basis of your consent or for automated processing;
- withdraw your consent;
- object to the processing of your personal information where our legal basis for processing your information is based on our legitimate interests, in which case we must stop processing your information unless we can demonstrate compelling legitimate interests which override your interests; and
- not to be subject to a decision based on automated processing, including profiling which has legal or similar significant affects.

If you wish to exercise any of your rights in this regard please contact us using the details in Section 16 below. We will process your request in accordance with applicable laws. We will request proof of identification to verify your request.

With respect to email communications and the use of our website, the privacy choices you may have about your personal information are determined by applicable law and are described below.

- Email communications. If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding products or services you have requested or purchased. We may also send you certain non-promotional communications regarding us and our products and services, and you will not be able to opt out of those communications.
- “Do Not Track.” Do Not Track (“DNT”) is a privacy preference setting that users can enable in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. Please be advised that TransRe does not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- Cookies and interest-based advertising. You may stop or restrict the placement of Technologies on

your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our website may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for [Android](#), [iOS](#) and [others](#).

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), [the European Digital Advertising Alliance](#), and [the Digital Advertising Alliance of Canada](#).

Please note you must separately opt out in each browser and on each device.

8. Automated decision making

TransRe through its business partners may use automated decision-making tools. If we do, you have a right not to be subjected to decisions based on automated processing, including profiling, which produce legal effects concerning you or similarly significantly affects you. In certain circumstances we would be entitled to make decisions based on solely automated decision-making and profiling. These cases are restricted to situations where the decision is necessary for entering into a contract, or for performing that contract (i.e. your policy of (re)insurance or quote), where it is authorized by law or where you have provided your explicit consent. If we were to base a decision on solely automated decision-making you would be entitled to have a person review the decision so that you can contest it and put your point of view and circumstances forward in accordance with the requirements of applicable law. For information on the automated decision-making practices of our business partners, please see their privacy notices.

9. Consequences of failure to provide personal information or withdrawing your consent

If we or our business partners cannot collect certain information, it may make it difficult, impossible, or unlawful for us to provide you with and/or administer our (re)insurance products.

If we or our business partners or other third parties ask for information and you do not wish to give it to us, or if you wish to withdraw consent to the use of your personal information, we or our business partners will explain the consequences based on the specific information concerned including whether it is a legal, regulatory or contractual requirement that we obtain such information.

If you have any queries in respect of the consequences of not providing information or withdrawing your consent, please contact us using the details in Section 16 below.

10. Supplemental California Privacy Notice

This section only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 (“**CCPA**”). The CCPA provides California residents with the right to know what categories of personal information we have collected about them and whether we disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding twelve months. California residents can find this information below:

Category of personal information collected by TransRe	Categories of third-parties to whom personal information is disclosed for a business purpose
Identifiers	Those third parties contemplated in Section 4
Personal information categories listed in Cal. Civ. Code § 1798.80(e)	Those third parties contemplated in Section 4
Protected classification characteristics under California or federal law	Those third parties contemplated in Section 4
Commercial information	Those third parties contemplated in Section 4
Internet or other electronic network activity	Those third parties contemplated in Section 4
Geolocation data	Those third parties contemplated in Section 4
Sensory data	Those third parties contemplated in Section 4
Professional or employment-related information	Those third parties contemplated in Section 4
Inferences drawn from other personal information to create a profile about a consumer	Those third parties contemplated in Section 4

The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forth above.

11. Additional privacy rights for California residents

- “Sales” of personal information under the CCPA. For purposes of the CCPA, we do not “sell” personal information, nor do we have actual knowledge of any “sale” of Personal Information of minors under 16 years of age.
- Non-Discrimination. California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.
- Authorized Agent. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. To designate an authorized agent, please contact us as set forth in Section 16 below.
- Verification. When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include confirming the email address associated with any personal information we have about you.

If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us as set forth below. We will process such requests in accordance with applicable laws.

In addition, California law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.

12. France privacy rights

This section only applies to our processing of personal information that is subject to the French Digital Republic Act which provides individuals in France with the following additional rights with regards to your personal information:

- Right to give instructions concerning the use of your personal information after your death.

If you want to make use of your aforementioned rights, please contact the Chief Privacy Officer using the contact information set out in Section 16 below. Please note that any such communication must be in writing.

13. Third-party websites/applications

Our website and other online services may contain links to other websites/applications and other websites/applications may reference or link to our websites and online services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

14. Changes to our privacy notice

We may revise this Privacy Notice from time to time in our sole discretion. If there are any material changes to this Privacy Notice, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Notice if you continue your relationship with TransRe after the new Privacy Notice takes effect.

15. Your right to complain to the data protection authority

If you are not satisfied with our use of your personal information or our response to any request by you to exercise any of your rights in Section 7 above, you may have the right to lodge a complaint with your local data protection authority. Please visit the following website(s) to obtain your local data protection authority's contact information:

- [New York Department of Financial Services \(NYDFS\)](#)
- [Luxembourg Commission Nationale pour la Protection des Données \(CNPD\)](#)
- [Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)
- [UK Information Commissioner's Office \(ICO\)](#)

16. Contact us

If you have any questions or concerns about this Privacy Notice, please email us at Privacy@TransRe.com or by contacting the person listed below.

Chief Compliance Officer
Transatlantic Reinsurance Company
One Liberty Plaza
165 Broadway, 16th Floor
New York, NY 10006
1-888-401-1224
1-212-365-2200

You can also contact our UK representative at:

Head of Legal and Compliance
TransRe London
Corn Exchange, 55 Mark Lane
London EC3R 7NE, United Kingdom
+44 (0)20 7204 8600
LondonEnquiries@transre.com

You can also contact our EEA representative at:

Head of Legal and Compliance
TransRe Europe SA
1, Avenue du Bois
L-1251 Luxembourg
+352 273 005 00