TRANSATLANTIC HOLDINGS, INC.
GLOBAL PRIVACY NOTICE

This Privacy Notice was last updated October 20, 2026.

The purpose of this Global Privacy Notice (the "Notice") is to explain how Transatlantic Holdings, Inc. and its subsidiaries and branches (collectively referred to as "TransRe," "our," "us," or "we") we collects, processes, and discloses your personal information, whether you interact with us on our website (https://www.transre.com), participate in surveys, or engage with us in person.

1. Introduction

This Notice applies to the TransRe entities listed below:

- 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 S.E., Germany, including its branches in France and Switzerland

This Notice does not apply to the entities listed below, which maintain their own separate privacy notices:

- Fair American Insurance and Reinsurance Company
- Fair American Select Insurance Company and
- Calpe Insurance Company Limited

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 Insurance Privacy Notice found on TransRe's internet site: 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 and Security Notice https://www.fairco.com/legal-information/privacy-and-security/.

We provide reinsurance and insurance services to companies and individuals. In connection with providing these services, we may collect certain forms of personal information. For the purposes of this Notice, "personal information" is information that relates to an identifiable, living, natural person. "Sensitive personal information" or "special categories of personal information" is personal information that requires special handling under applicable law and may include information such as medical information, financial account information, and biometric information. Aggregated and publicly available data is not considered personal information for purposes of this Notice.

We recognize the importance of effective and meaningful privacy protections when collecting, processing, and disclosing personal information. This Notice outlines the different types of personal information we collect and how we collect and manage such information. This Notice also notifies customers of their privacy rights concerning their data under applicable law.

This Notice does not apply to TransRe employees or job applicants.

2. Personal Information We Collect and Where We Collect It From

TransRe is the controller of your personal information that is processed under this Notice. In order to operate our business more efficiently, 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, including your driver's license number.
Credit, fraud prevention, and sanctions related information	Credit and fraud prevention information such as credit history, credit score, criminal offenses, bank account information, information from various fraud prevention databases and information from sanctions lists, as 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, as well as information relating to criminal convictions including data about offenses, court sentences or unspent criminal convictions, as permitted under applicable laws.
Claims information	Information about previous and current claims, which may include other insurance policies, 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, as permitted under applicable laws.
Risk details	Information about you which we need to collect in order to assess the risk to be insured and underwrite and bind. This may include information relating to your health, relevant criminal convictions, or other special or sensitive categories of personal information, as permitted under applicable laws.

Sources where we may collect information may include:

Source	Information Collected
Our business partners	Information that is provided to us by third parties who provide insurance and reinsurance or insurance or reinsurance-related services, for example insurance and reinsurance companies, brokers, loss adjusters, claims administrators, legal advisers, assistance providers, experts and, in some circumstances, private investigators or fraud investigators or other commercially available third-party sources.
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.

Protected Health Information. TransRe is not a covered entity or business associate under the Health Insurance Portability and Accountability Act (HIPAA). However, to the extent we receive medical- or health-related information in connection with our insurance and reinsurance operations, we treat such information with heightened safeguards consistent with applicable law.

Credit Information. Credit information that we may collect may be regulated and protected under the Fair Credit Reporting Act ("FCRA"). Information obtained from a report prepared by an insurance support organization, such as a credit reporting agency, may be retained by the insurance support organization and disclosed to other persons.

Artificial Intelligence. To increase efficiency and improve our level of service, we may use artificial intelligence systems or some equivalent machine-based learning ("AI Systems") as permitted by applicable law. These AI Systems related to submission intake may be used to assist in the handling of your business. Underwriting decisions are not made by AI Systems. Our use of these AI Systems will not replace the good faith, equitable consideration given to each account by our underwriters but rather will be used to supplement it.

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, 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 online services.

3. **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 us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our use of these Technologies falls 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 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 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 on our online services or on third-party websites to deliver content, including ads relevant to your interests.

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.

4. How We Use Personal Information and Our Legal Basis for Doing So

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

Basis	Description
Compliance with legal and regulatory obligations	We process personal information where it is necessary to comply with our legal and regulatory obligations.
Legitimate business interests	**Carrying on insurance and reinsurance business.** We may process personal information for the purpose of underwriting, evaluating risk, pricing, monitoring, accounting, analytical and statistical purposes 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: • policy issuance and administration. • claims processing and risk modeling and analytics. • renewals. • enforcing our agreements and policies. **Interest in Managing Our Business.** We may use personal information for managing our business, including, without limitation: •performing internal and external audits and quality controls. •verifying your identity. •sending communications regarding our website, programs or services, customer accounts, or any changes to any policy or terms of service. •processing payments. •preventing potentially prohibited or illegal activities. •enforcing our agreements. •investigating and responding to complaints. •establishing, exercising, or defending legal claims. •protecting and enforcing the rights, property, or safety of TransRe, our customers, or others including security and fraud prevention for identification/authentication purposes. **Research and Development.** We may use personal information to help us optimize and improve our existing products and services and to develop new products and services. **Disclosing Personal Information to Affiliated Organizations.** We process personal information for the purposes of insurance and reinsurance and may disclose business, reporting, financial and audit information with our affiliated organizations. This processing is necessary to support our legitimate interests in managing our business or the business of affiliated organization provided such interests are consistent with applicable law and your interests and rights. **Direct Marketing and Advertisement**. We may use personal information to tailor and provide materials about offers, products and services we offer, including new content or services on our websites. We may provide these materials by phone,

Basis	Description
	postal mail, facsimile, email, or as otherwise permitted by applicable law. See Section 16 below for contact information to opt out of the use of personal information for such purposes **Physical Security, IT and Network Security.** We process personal information with careful attention to both physical, IT and network security. We maintain an information security program that includes administrative, technical, physical, and organizational safeguards designed to protect the confidentiality, integrity, and availability of personal information **Comply with Applicable Laws**. We process personal information: •for fraud prevention and investigation and dealing with other criminal activity. •for internal risk assessment and control (e.g., detect or resolve cyber incidents or fraud) •to comply with judicial or regulatory requirements, including to exercise our rights in judicial, administrative or arbitration litigation. •other regulatory or statutory reporting requirements. We may also generate de-identified and/or aggregated information 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. 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. **Recognized Legitimate Interests.** With respect to UK personal information, we may process your personal data under the recognized legitimate interests, which are pre-approved purposes set out in UK law, provided the processing is necessary for one of those purposes.
Consent	We 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. Please see the "*Consequences of Failure to Provide Personal Information or Withdrawing Your Consent*" Section below.
Otherwise permitted by law	We may process your personal information as otherwise permitted under applicable laws. **Insurance Processing Disclosure – UK.** We process certain personal data under the insurance exemption provided by UK law. This exemption allows us to handle personal information without fulfilling certain data subject rights where it is necessary for the purposes of arranging, underwriting, or administering an insurance contract, or dealing with insurance claims. We will only rely on this exemption where it is strictly required and proportionate, and we will continue to

Basis	Description
	protect your data in line with our privacy and security obligations.

Sensitive personal information is categorized differently in different countries and U.S. states. We will only collect and 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 insurance and reinsurance purposes where it is permitted by law, including advising on, arranging, underwriting or administering an insurance or reinsurance contract, administering a claim under a reinsurance contract, risk management and modeling, exercising a right, or complying with an obligation, arising in connection with an insurance and reinsurance 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.

Transfers of sensitive personal information are also limited by applicable law, including a right to be informed of the transfer and categories of data involved. Unless requested by us, please do not include in any communications with TransRe any type of sensitive personal information about yourself or anyone else.

Please note that in some cases TransRe's use of personal information may be governed by the agreement we have with our customer/business partner. Our customers and business partners may also be controllers of your personal information. In these cases, if you have questions or concerns about how your personal information is handled, or if you wish to exercise your rights, you should contact the person or entity (such as the data controller or business) that has engaged our services. While they may be the appropriate point of contact for certain requests, you may also reach out to us, and we will respond or direct you as required when applicable.

5. Disclosing Your Personal Information

So that we can effectively operate our business and comply with legal obligations imposed on us, we may disclose your personal information to third parties, including the following:

- with business contacts such as program administrators, managing general agents, insurance brokers, actuaries, accountants, insurers and reinsurers, retrocessionaires and insurance and reinsurance brokers, 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 us or our third parties rights, property or safety of , 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 we are 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, we will provide notice before Personal Information is transferred and subject to a new privacy policy different from this policy.

6. 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 our different 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 an international data transfer agreement between us and our subsidiaries and in our contracts with other third parties to ensure that any personal information leaving the EEA, Switzerland, the UK, Gibraltar and/or other international branches of TransRe will be transferred and subsequently processed in a manner consistent with the requirements of applicable data protection laws. Copies of the applicable clauses are available on request by using the contact details listed in Section 16 below.

7. Retention of Personal Information

We retain your personal information for as long as necessary to carry out the purposes for which we originally collected it and for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations. Specifically, we will retain your personal information while we have an ongoing relationship with you and during the length of time you receive services from us. We may also need to retain your personal information after your relationship with us ends if we are subject to a legal obligation to keep the information or if we need to maintain the information for business, tax, or accounting purposes.

8. Children

Our website and online services are not directed to children under the age of 16. We do not knowingly collect personal information from children under 16. If we learn that we have collected personal information from a child under 16 without verification of parental consent, we will take steps to delete that information.

In connection with our insurance and reinsurance business, we may receive personal information relating to individuals under the age of 16. This information is not collected directly from the child, but rather is provided to us by the policyholder, insured, ceding company, broker, or other authorized business partner in connection with the underwriting, administration, or claims handling of that policy or reinsurance agreement. We process such information only as necessary to perform our contractual and business obligations, comply with legal and regulatory requirements, and for other legitimate business purposes consistent with this notice

9. Automated Decision Making

TransRe does not currently make any material decisions based solely on automated processing, including profiling,

that produce legal effects concerning you or which may significantly affect you. If TransRe's use of automated decision-making changes such that a decision is made solely through automated means and produces legal or other significant effects, we will update this Notice to describe the categories of decisions affected, the general logic and factors involved in reaching such decisions, and the significance and envisaged consequences of such processing for you.

TransRe, including through its business partners, may use automated decision-making tools. Where such tools are used, you may have rights under applicable law not to be subjected to decisions made solely through automated processing, including profiling, that produce legal or similarly significant effects. In certain circumstances, we may be permitted to rely solely on automated decision-making, such as when it is necessary to enter into or perform a contract, where authorized by law, or where you have provided consent. If a decision affecting you is made solely through automated means, you may have the right to request human review, express your views, or contest of the decision, consistent with applicable law. For information about the automated decision-making practices of our business partners, please see their respective privacy notices.

10. Consequences of Failure to Provide Personal Information or Withdrawing Your Consent

We need to process certain personal information in order to meet our business, legal, and regulatory obligations. When we collect information from you, we will make it clear what information is required. If the information you provide is inaccurate or incomplete, we may not be able to provide you with and/or administer our insurance and reinsurance products.

If we, our business partners, or other third parties request information and you choose not to provide it, or if you withdraw consent where consent is the basis for processing, we or our business partners will explain the potential consequences based on the specific information involved, including whether the request is required by law, regulation, or contract.

If you have any questions about the consequences of not providing information or withdrawing your consent, please contact us using the details in Section **Error! Reference source not found.**.

11. Your Choices

"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.

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, 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.

Email Communications. You may opt out of receiving emails from us by following the instructions found at the bottom of those communications. If you opt out, you may continue to receive transaction-related emails regarding products or services you have requested or purchased or our ongoing business relations.

12. Your Rights

You may have rights under applicable law in relation to your personal information. 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 a contract and carried out by automated means.
- withdraw your consent.
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- not to be subject to a decision based on automated processing, including profiling which has legal or similar significant affects.

Where our legal basis for processing your information is based on our legitimate interests you have a right to object to the processing of your personal information. In such a case we must stop processing your information unless we can demonstrate compelling legitimate interests which override your interests.

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 may not always be able to grant your request. We will always respond to your request within the timeframes laid out in local laws and regulations. We will need to verify your identity before we share any details relating to personal information. If you are making a request on behalf of someone else (e.g., a friend or relative) we may require further information to ensure that you are authorized to make the request. When we respond to your request we will explain clearly whether we accept your request, the rationale for our decision, and what will happen next. We may charge a reasonable fee to cover the costs incurred in providing a copy of recorded personal information.

The law in some jurisdictions may provide you with additional rights regarding our use of personal information. To learn more about any additional rights that may be applicable to you as a resident of one of these jurisdictions, please see the supplemental notices below.

U.S. State Insurance Laws

State insurance laws may provide you with additional rights regarding your personal information. You may request, in writing, a copy of certain data that we maintain about you to review its completeness and accuracy. To the extent required by applicable law, we have 30 business days after receiving such request to send a copy of the data to you as well as the name and address of any institutional source from which we have received information about you. We may not always be able to grant your request as some data we are not required to share.

If you believe the data we have about you is incorrect, you may notify us in writing of what data you would like to correct, amend or delete and the reason for such request. To the extent required by applicable law, we will respond within 30 business days. If we agree, we will change our records accordingly. We will send the changed data to any organization that has received the inaccurate information from us. The changed data will also be included in any later disclosures to others. If we disagree, we will tell you the reason why. You can provide us with a brief statement explaining why you believe that the data is incorrect and this statement will become part of your records with us. We will also send it to any persons that have received the disputed information from us and will also be included in any later disclosures to others.

Supplemental California Privacy Notice

Please see our website for our supplemental California Privacy notice which applies to our processing of personal information subject to California law.

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 Global Privacy Counsel 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 Global Privacy Notice

We may revise this Notice from time to time in our sole discretion. If we make changes, we will notify you by revising the date at the top of this Notice. If there are any material changes to this Notice, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Notice if you continue your relationship with TransRe after the new Notice takes effect. We encourage you to review this Notice regularly to stay informed about our information practices and the choices available to you.

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 12 above, you have the right to lodge a complaint with your local data protection authority. Where the EU GDPR applies, you may lodge your complaint with a supervisory authority in the EU or EEA Member State of your habitual residence, your place of work or the place of the alleged infringement. You may contact us as described in Section 12 above before lodging a complaint, but you are not required to do so. Depending on your location and the TransRe group company responsible for processing your personal information, the relevant authorities may include:

- **New York Department of Financial Services (NYDFS)**
- **Swiss Federal Data Protection and Information Commissioner (FDPIC)**
- **UK Information Commissioner's Office (ICO)**
- **Germany: Bavarian State Office for Data Protection Supervision (BayLDA)**
- **Contact information for EU and EEA data protection supervisory authorities is also available from the European Data Protection Board.**

16. Contact us

If you have any questions or concerns about this Notice, or wish to make a complaint about our handling of your data, 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 S.E.
Salvatorstraße 3
80333 Munich
Germany

Data Protection Officer for Germany
One Liberty Plaza
165 Broadway, 16th Floor
New York, NY 10006
1-888-401-1224
1-212-365-2200
DPO.TRESE@transre.com