



**PRIVACY NOTICE for
applicants, policyholders, insured persons, beneficiaries or injured parties**

Version 01 May 2021

This notice is designed to provide you with information about the processing of your personal data by General Reinsurance AG and about your rights according to data protection law.

1 Controller of the processing – Who are we?

General Reinsurance AG
Theodor-Heuss-Ring 11,
50668 Cologne, Germany
Tel.: +49 221 9738 0
Fax: +49 221 9738 494
E-mail: AskGenRe@genre.com

You can contact our Data Protection Officer at the above address, marking your correspondence for the attention of the Data Protection Officer, or by e-mail at DPO_EU@genre.com.

2 Purposes of Processing and Data Categories

We process your personal data while complying with the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act and all other relevant national laws. Even though we are not subject to the German Insurance Industry's Code of Conduct, we accept it as industry standard.

Insurance companies often pass on a portion of their risks to reinsurers such as us. In these cases, General Reinsurance AG may be involved at several stages of this process:

- during the insurance application;
- for the duration of your insurance policy and for the time we need to keep the data for the purposes listed below; or
- when you are bringing forth a claim to be paid by the reinsurer.

We process the data of insurance applicants, insurance holders, claimants, injured parties and beneficiaries.

Depending on the insurance product that your primary insurer reinsures with us, the categories of data we process can include:

- Personal information, e.g. name, profession and date of birth;
- Insurance Contract based data;
- Claims related data;
- Health Data, e.g. as your medical history;
- Financial data, e.g. payment history and credit score;

Some products offered by primary insurers may use innovative data, such as data generated by sports trackers or mobile apps

We strive to only obtain data once it has been rendered anonymous or undergone pseudonymisation. This means, in many cases, we can either not identify you from the data we receive at all, or we receive data that is related to you, but has been stripped of direct identifiers such as your name, which has been replaced by a number or another placeholder. Usually the key to identifying you is held by your insurer and not transmitted to us, so we cannot relate this information to you.

We may process your data for the following purposes:

- For underwriting, claims management, pricing, monitoring and accumulation control (limitation of risk exposure).
- For accounting purposes and plausibility checks related to accounting.

- For analytical and statistical purposes, e.g. the creation and maintenance of statistical models and rate calculation tools;
- Product review and development
- To prevent and detect criminal offences such as instances of insurance fraud;
- To perform internal and external (of your insurer) audits and quality checks;
- To monitor and revise internal processes
- To further share a part of the risk with other reinsurers (retrocession).
- To fulfil statutory obligations and mandatory retention periods.

3 Legal Basis

Depending on the circumstances at hand, we process your data for the above-mentioned purposes based on one or more of these legal grounds:

- The contract you concluded with your insurer – see Art. 6(1)(b) GDPR.
- Your explicit consent – see Arts. 6(1)(a), 7 and 9(2)(a) GDPR.
- Applicable laws that mandate and/ or allow the processing of data under the applicable circumstances – see Arts. 6(1)(c) and Art. 9(2)(b) GDPR in conjunction with the respective laws.
- The processing is necessary for the exercise and defence of claims – see Art. 9(2)(f) GDPR.
- Special categories of personal data manifestly made public by you – see Art. 9(2)(e) GDPR.
- Our legitimate interests – see Art. 6(1)(f) GDPR.

4 Categories of recipients of personal data

4.1 Data processing and sharing within the Gen Re group of companies

Your personal data, we received from your primary insurer, may also be processed by Gen Re group employees located outside of the European Union for:

- The purposes listed under section 2, and
- IT services, including the hosting of applications and systems that are used to process insurance and reinsurance related data.

4.2 Additional reinsurers

To enable us to meet our obligations under our reinsurance relationships, we may pass on a portion of the risks reinsured with us to other reinsurers for the purpose of risk mitigation..

4.3 External service providers

In some cases, we use external service providers in the following categories in order to meet some of our contractual and statutory obligations:

- Assessors / medical experts for the drawing up of expert opinions on underwriting and claims management
- Data management service providers for the storage and destruction of files
- IT service providers for the maintenance, operation and securing of systems and applications, data recovery and data destruction
- Data analytics providers
- Translators for the translation of underwriting and claims management documents
- Service providers to support application, claims and inventory processing

- Audit service providers to perform internal audits and IT security audits

4.4 Additional recipients:

Some primary insurers and additional reinsurers use intermediaries or service providers to initiate or manage their reinsurance relationship with us. In these cases, your data, which we process for the above-mentioned purposes, is transmitted between us and your primary insurer or between us and an additional reinsurer via such brokers and service providers.

In addition, it may become necessary for us to transmit your personal data to further recipients, such as public authorities, in order to comply with statutory notification obligations (e.g. social insurance agencies, financial authorities, supervisory authorities, auditors or law enforcement authorities).

5 Data transmission via a third country

Some of the recipients we transmit personal data to (see Sec. 4) are located outside the European Economic Area (EEA). Transmission may take place only if the EU Commission has confirmed that the third country has an appropriate level of data protection or that other appropriate data protection guarantees (e.g. binding company-internal data protection provisions or EU standard contract clauses) are in place. We make sure that the recipients of your data in any Non-European location comply with and fulfil European data protection standards, i.a. by making sure appropriate technical and organizational privacy measures are in place.

Examples for the transmission of personal data to Gen Re group companies, located in third countries, include in particular the transfer to the United Kingdom, Australia, South Africa and the United States. Subject to adherence with legal requirements, these transfers may include also special categories of personal data, e.g. health-related information.

6 What rights do you have in relation to your data?

6.1 Rights of data subjects

You can request information on the data stored about you. In addition, you can request that your data is rectified or deleted subject to specific requirements. Furthermore, you may be entitled to restrict the processing of your data and to demand the provision of data provided by you in a structured, commonly used and machine-readable format.

6.2 Right to object

If we process your data in order to safeguard legitimate interests, you have the right to object to such processing if you have reasons to disagree with the processing of data as a result of your particular situation.

6.3 Right to lodge a complaint

You have the option to lodge a complaint with the above-mentioned Data Protection Officer or a data protection agency of your choice, especially in the EU member state of your residence or the place where the infringement is alleged to have occurred¹. The following data protection agency has responsibility for us:

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen
(Data Protection and Freedom-of-Information Officer for the State of North Rhine-Westphalia)
Postfach 20 04 44

¹ The contact data of the data protection agency can be found on the official website of the European Commission at http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm

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7 Data storage period

We will delete your personal data as soon as it is no longer required for the above-mentioned purposes.

Moreover, we store your personal data in accordance with the retention periods as provided by various legislation and applicable industry standards (e.g. retention periods provided for by tax and commercial codes).