

Last Updated: June 2022

## Privacy Policy

This Privacy Policy describes how **RenaissanceRe Holdings, Ltd.** and its affiliates, (collectively, '**RenaissanceRe**'; '**we**'; '**us**') collect and process your Personal Data when

- (i) you are an applicant, claimant, policyholder, (prospective) insured party or other affected person (e.g., injured party or beneficiary) for which we act as either an insurer or reinsurer ('**Insured**');
- (ii) you are an individual working for one of our business partners ('**Business Contact**');
- (iii) you otherwise interact with us online or offline such as by visiting our offices ('**General Contact**') (collectively, '**you**' and '**your**').

This Privacy Policy does not apply to Personal Data collected about employees, independent contractors, or job applicants for which separate Policies apply.

'**Personal Data**' as used in this Privacy Policy means any information that can directly or indirectly identify an individual or as otherwise defined or interpreted under the applicable data protection laws of the country you are in.

For data which we process about you, RenaissanceRe may act as the controller for the processing of your Personal Data depending on how this data is received by RenaissanceRe. For insureds, claimants and beneficiaries, you should, either as part of your insurance policy or at the point of making a claim, have been provided with a summary privacy notice. If you have not seen a copy of this, then please contact us via the contact details section below. If you are a Business Contact or General Contact, the RenaissanceRe entity who you are in contact with acts as controller for your Personal Data.

When you do not have a direct relationship with us or we are not in direct contact with you, we ask those who are to provide you with a copy or link to this Privacy Policy. Equally, when you believe you are in direct contact with an individual who may be covered by this Privacy Policy, we ask that you please share this Privacy Policy with them.

### **(Re)insurance operations in the UK**

Insurance involves the use and disclosure of your Personal Data by various insurance market participants such as intermediaries, insurers and reinsurers. The [London Market Core Uses Information Notice](#) sets out those core Personal Data uses and disclosures, along with a number of terms which are defined within this Privacy Policy.

## How we collect your Personal Data

We may collect your Personal Data from various sources, including:

- you;
- your family members, employer or representative;
- other insurance market participants such as brokers, (re)insurance companies etc.;
- in the event of a claim, third parties including the other party to the claim (claimant / defendant), witnesses, experts (including medical experts), loss adjusters, solicitors, and claims handlers
- publicly available information such as court judgments, fraud databases, government databases, credit reference agencies etc.

Your particular circumstances will determine which of the above sources apply.

## Personal Data we may collect and process

The below sets out the types of Personal Data we may process about you:

Types of Personal Data	Details
<b>Individual details</b>	Name, address (including proof of address), other contact details (e.g., email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you. This information will not typically be collected by RenaissanceRe, however, it may be required to pay a claim, help prevent fraud, or may be information provided by you as part of a claim or a complaint.
<b>Identification details</b>	Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving license number. This information may be used to verify your identity prior to paying a claim or to prevent fraud.
<b>Financial information</b>	Bank account or payment card details, income or other financial information.
<b>Risk details</b>	Information about you which we need to collect in order to assess the risk to be insured and provide a quote. This may include data relating to your health or other information you provide us with as part of a claim or a complaint which are special categories of Personal Data.
<b>Policy information</b>	Information about the quotes you receive and policies issued to you.
<b>Background information checks</b>	Information which is publicly available relating to you including criminal offenses and convictions, sanctions, credit history, anti-fraud data, etc.
<b>Previous and current claims</b>	Information about previous and current claims, (including other unrelated insurances), which may include data relating to your health or other information you provide us with as part of a claim or a complaint which are special categories of Personal Data.
<b>Special categories of Personal Data</b>	Certain categories of Personal Data which have additional protection under the applicable data protection legislation. Such categories are generally health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation.

	RenaissanceRe will not typically process information relating to the categories listed above other than where this information is publicly available, specifically requested from you with your consent or where you have made this information available to us as part of a claim or a complaint.
<b>Visual information</b>	Images collected from security cameras in our offices and basic contact details for visitor registration purposes such as your name, relevant professional information and contact details.
<b>Other</b>	Information you voluntarily share with us (e.g., when you contact our customer service or otherwise engage with us).

Depending on the capacity in which you interact with us (i.e., insured, Business Contact or General Contact), we may need to process your Personal Data in order to respond to your inquiry, communicate with you, handle claims, assess risk, and perform the other uses as described below. If we are not provided your Personal Data, we are not able to undertake these activities and this may result in your insurance application being denied, among other things.

### Personal Data of Minors

Our products and services are not directed to minors under the age of 13 and we do not knowingly collect or sell the Personal Data of minors under 16.

## How we use your Personal Data

We set out below the purposes why we and other (re)insurance market participants might use your Personal Data. The lawful basis set out below may vary according to the applicable data protection legislation regarding the processing of your Personal Data.

<b>Purpose</b>	<b>Description</b>	<b>Lawful basis</b>
Provision of (re)insurance cover	<ul style="list-style-type: none"> <li>Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks.</li> <li>Evaluating the risks to be covered and matching to appropriate policy/premium.</li> <li>Payment of premium where the insured/policyholder is an individual.</li> <li>Client care, including communicating with you and sending you updates.</li> <li>Payments to and from individuals.</li> <li>To perform data analysis and determine the scope of the reinsurance agreements and monitor accumulations.</li> <li>To improve our (re)insurance products and services and carry out market research.</li> <li>To provide support to your insurance company in assessing risk and losses, and in evaluating procedures.</li> </ul>	<ul style="list-style-type: none"> <li>Performance of a contract.</li> <li>Complying with legal and regulatory obligations.</li> <li>Legitimate interests.</li> </ul>

	<ul style="list-style-type: none"> <li>• To monitor risks and claims.</li> <li>• To perform audits of others including the primary insurer.</li> </ul>	
Claims processing	<ul style="list-style-type: none"> <li>• Managing insurance and reinsurance claims.</li> <li>• Defending or prosecuting legal claims.</li> <li>• Investigating or prosecuting fraud.</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract.</li> <li>• Complying with legal and regulatory obligations.</li> <li>• Legitimate interests.</li> </ul>
Complaints handling	<ul style="list-style-type: none"> <li>• Carrying out audits and investigations, and to investigate and resolve complaints, grievances or misconduct.</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract.</li> <li>• Complying with legal and regulatory obligations.</li> <li>• Legitimate interests.</li> </ul>
To defend RenaissanceRe against legal proceedings / Required by Law	<ul style="list-style-type: none"> <li>• Preparing for and acting in relation to enquiries, investigations or proceedings, by governmental, administrative, judicial or regulatory authorities, including civil litigation.</li> <li>• Responding to requests from public authorities and fraud and money laundering prevention.</li> </ul>	<ul style="list-style-type: none"> <li>• Complying with legal and regulatory obligations.</li> </ul>
Other purposes	<ul style="list-style-type: none"> <li>• Transferring books of business, company sales &amp; reorganizations</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract.</li> <li>• Complying with legal and regulatory obligations.</li> <li>• Legitimate interests.</li> </ul>

### The use of consent to process your data

In order to provide you with insurance cover or to deal with insurance claims there may be certain circumstances where we need to process your special categories of Personal Data, such as your health data. We will not typically request this from you, however, this information may be processed as part of a claim or a complaint, and in order for us to provide you with the best possible service we may need to obtain your consent to process this data.

In these instances, explicit consent will be requested from you, and you retain the right to withdraw your consent to such processing at any time. However, if you withdraw your consent this may impact our ability to pay claims or handle your complaint.

### Automated Decision-Making

Automated-decision making, or 'profiling' is the use of Personal Data to automatically evaluate and then analyze or predict personal aspects concerning your health, reliability, behavior, economic situation and other personal aspects. RenaissanceRe does not perform automated decision-making (including profiling) for its (re)insurance activities.

## Marketing and sale of data

RenaissanceRe does not sell your Personal Data nor do we use your Personal Data for marketing purposes.

## Your Rights

You may have certain rights over your Personal Data depending on any data protection legislation which may apply to the processing of your data. The data protection legislation which may apply is generally determined by where you are resident and/or where data concerning yourself is being processed.

Subject to applicable laws and regulations, these rights may include:

Rights	Detail
Right of transparency	You may ask us to provide you with further details on the use we make of your Personal Data/special category of data.
Right of access	You may ask us to provide you with a copy of the Personal Data that you have provided to us.
Right to rectification	You may us to update any inaccuracies in the Personal Data we hold.
Right to erasure	You may ask us to delete any special category of data/Personal Data that we no longer have a lawful ground to use.
Right to withdraw consent	Where processing is based on consent, the right to withdraw your consent so that we stop that particular processing.
Right to object	You may object to any processing based on the legitimate interests grounds unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights; and
Right to restriction of processing	You may ask us to restrict how we use your Personal Data whilst a complaint is being investigated.
Right to data portability	You may ask us to receive your Personal Data in a structured, commonly used and machine-readable format.

To exercise these rights or to find out if these rights will apply then please contact us using the contact details set out in this Privacy Policy.

If you are unhappy with the way we have used your Personal Data or our response to any request by you to exercise any of your rights in the section above, or if you think that we have breached the applicable data protection legislation, then you may have the right to complain to the relevant data protection supervisory authority.

## Sharing of Personal Data

The following is a non-exhaustive list of third parties we may disclose your Personal Data to:

- Other companies within the RenaissanceRe Group;
- Insurance companies, Coverholders, delegated claims administrators, claims adjusters, law firms, reinsurers, brokers and other companies in the insurance chain as applicable;
- Consultants, and professional advisors engaged by RenaissanceRe;

- Information technology systems providers (duly appointed as processors as applicable) and involved in the provision of services to RenaissanceRe including for areas such as policy administration, risk analysis, document management, etc.
- Independent public accountants and auditors, authorized representatives of internal control functions such as audit, legal, and/or corporate security;
- Local tax authorities and any governmental or administrative body where RenaissanceRe determines that it is necessary or desirable in order to comply with applicable laws, court orders, or government regulations; and
- A third party that is looking to acquire or does acquire all or part of the assets or stock of RenaissanceRe, or that succeeds RenaissanceRe in carrying on all or a part of the business of RenaissanceRe or services provided to or by it whether by merger, acquisition, reorganization, outsourcing, insourcing or otherwise.

When sharing your Personal Data with third parties, RenaissanceRe will ensure that the third parties have appropriate technological and organizational measures in place to keep your data secure.

### **International Data Transfers**

Where a third party processes your Personal Data in a country or countries outside of the jurisdiction, RenaissanceRe will only transfer the data to that third party where this is in line with applicable data privacy legislation and subject to the use of appropriate safeguards where required.

You may obtain more information with regard to the transfer mechanism used by contacting us using the contact details set out in this Privacy Policy.

## **Data Security and Retention**

RenaissanceRe only retains your Personal Data for as long as necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law or regulation.

Your data will be held within a secure environment and will be subject to a range of appropriate technical and organizational measures.

Further details on how your information is retained and how it is kept secure are available by contacting us using the contact details set out in this Privacy Policy.

## **Other websites**

Our website provides links to other websites. These websites may operate independently from us and may have their own privacy notices or policies, which we advise you to review. To the extent any linked websites are not owned or controlled by us, we are not responsible for their content or the way in which they process Personal Data.

## **Accessibility**

We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us using the details set out in this Privacy Policy.

## Changes to this Privacy Policy

We will review and update this Privacy Policy as required to keep current with rules and regulations, new technologies and security standards. We will post those changes on the website or update the "last updated" date of the Privacy Policy. In certain cases and if the changes are material, you will be notified via email or a notice on our website.

## How to contact us

RenaissanceRe acts as a data controller for your Personal Data in a number of situations and if you have any questions or concerns over how your data has been processed, then please contact us using the details below:

Email: [dataprotection@renre.com](mailto:dataprotection@renre.com)