



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

Version May 2025

This notice is designed to provide you with information about the processing of your personal data by General Reinsurance AG ("GRAG"), including all branches and representative offices of GRAG, 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 European 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.

We are a global company with branches and representative offices in multiple countries. You can find a list of all GRAG offices on the Gen Re homepage under "Contact Us". Please note that various of our branches and representative offices located outside of the European Union have separate privacy notices in accordance with locally applicable laws. You can find these under "Contact Us" as well.

2 Purposes of Processing and Data Categories

We process your personal data (also referred to as personal information) while complying with the applicable data protection laws of the jurisdictions in which we operate, amongst them the EU General Data Protection Regulation ("GDPR").

Insurance companies may pass on a portion of the risks insured by them to reinsurers such as us. In these cases, we may process personal data from you received through the insurance company:

- During the insurance application (medical/financial underwriting, i.e. when evaluating insurance-specific risks);
- For the duration of your insurance policy and for the time we need to retain the data for the purposes listed below; and
- For the assessment and settlement of claims;

Depending on the nature of the insurance policy and the contract we have with our clients, we process the data of insurance applicants, insurance holders, claimants, injured parties and beneficiaries.

2.1 In light of the above-mentioned contractual obligations of a reinsurer, 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;
- For consulting services offered towards insurance companies
- 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 processes;
- To further share a part of the risk with other reinsurers (retrocession);
- To fulfil statutory obligations and mandatory retention periods.

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

- Personal contact information, e.g. name, profession and date of birth;
- Offer/Insurance Contract based data, e.g. application IDs and data correlating with your insurance product at your insurance company;
- Claims related data, e.g. the underlying facts of a claim, the claims sum and records shared with your insurer in that regard;
- Underwriting data that is necessary to assess the insured risk and that you have disclosed to your insurer, e.g. data related to the insured property or health data (as your medical history);
- Financial data, e.g. payment history and credit score;

2.3 From which sources do we obtain your personal data ?

- Typically, we obtain personal data not directly from you, but from your insurance company or other third parties that handle insurance contracts in collaboration with your insurance company (e.g. brokers, agents).
- In rare cases, we contact you directly to request personal data or obtain personal data from publicly available sources, in particular with regard to personal data you have made publicly yourself.

In most cases, we do not receive your name and address but process pseudonymized information from you. This means, in many cases, we can either not identify you from the data we receive directly as 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 (e.g. the insurance policy ID shared by your insurer). Usually the key to identifying you is held by your insurer and not transmitted to us, so we cannot directly relate this information to you without getting additional information from your insurer.

3 Legal Basis

Depending on the purposes described above, we process your personal data based on one or more of these legal grounds:

- Your explicit consent that you have given your insurer and that covers the processing of personal data by reinsurers.
- The insurance contract that you have entered into with your insurer.
- Applicable laws that mandate and/or allow the processing of data under the applicable circumstances.
- The processing is necessary for the exercise and defence of claims.
- Sensitive data (e.g. special categories of personal data within the meaning of the GDPR) manifestly made public by you.
- Our legitimate interests.

4 Categories of recipients of personal data

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

In accordance with applicable laws, your personal data may also be processed by Gen Re group companies and branches located in other jurisdictions for the purposes listed under section 2.

Within the Gen Re group of companies, IT services and infrastructure are shared, including the hosting of applications and systems that are used to process insurance and reinsurance related data.

A list of all Gen Re offices can be found under the following link:

<https://www.genre.com/content/dam/generalreinsuranceprogram/documents/legal-entities.pdf>.

4.2 Additional reinsurers

To enable us adequately distributing our reinsurance risks, we may pass on a portion of the risks reinsured with us to other reinsurers for the purpose of risk sharing.

4.3 Insurance brokers and other providers for insurance-specific services

We, your insurer or the additional reinsurers we work with, may use insurance brokers and other providers for insurance-specific services (“intermediaries”) to initiate or manage the reinsurance relationship. In these cases, your data is transmitted between us and your insurer or between us and an additional reinsurer via such intermediaries.

4.4 External service providers

In some cases, we use external service providers in the following categories, e.g. in order to meet some of our contractual and statutory obligations or for other purposes than described above:

- Assessors / medical experts;
- Data management service providers;
- IT service providers;
- Data analytics providers;
- Translators;
- Auditors;
- Other service providers e.g. consultants to support us in delivering our services.

Typically, the above categories of service providers are data processors. They process personal data only on our behalf and subject to our instructions.

4.5 Other recipients:

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 to third countries

If we process data e.g. by way of transmission to a third country (e.g. outside the EU, or the European Economic Area (EEA)) or the processing takes place in the context of the use of third-party services or disclosure or transfer of data to other persons, bodies or companies, this will only take place in accordance with the applicable legal requirements.

For personal data subject to GDPR, we process or have processed the data only

- in third countries with a recognised level of data protection, a list of all such countries can be found under the following link: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en;
- on the basis of special guarantees, such as a contractual obligation (e.g. through so-called standard contractual clauses of the EU Commission for transfers from the EU/EEA to third countries), the standard contractual clauses template issued by the EU Commission can be found under the following link: https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en;
- in case the transfer is made between a data exporter in the EU/EEA and a data importer in the U.S., and the data importer in the U.S. is self-certified under the EU U.S. Data Privacy Framework, a list of all self-certified legal entities can be retrieved under the following link: <https://www.dataprivacyframework.gov/>; or
- if certifications or binding internal data protection regulations justify the processing.

Gen Re utilizes a data processing agreement for internal data sharing within the different jurisdictions based on the standard contractual clauses issued by the EU commission (see link above). If you wish more information on this, please contact our Data Protection Officer (see section 1 for the contact details).

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
40102 Düsseldorf
Germany
Tel.: +49 (0)211/38424-0
Fax: +49 (0)211/38424-10
E-mail: poststelle@ldi.nrw.de
Internet: www.ldi.nrw.de website

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

7 Data retention period

The data processed by us will be deleted or anonymized as soon as it is no longer required for the purposes mentioned in this notice. Personal data may be retained for the period during which claims can be asserted against our company (statutory limitation period of three or up to thirty years). We also retain your personal data insofar as we are legally obliged to do so.

Statutory retention periods may require data retention for up to 30 years, depending on the underlying purpose of processing and applicable national laws.

If we process personal data based on your consent, we will generally retain such personal data for as long as the consent exists and can be legally used by us. After withdrawing your consent, we may retain documentation data on that consent for a certain period to enable us defending against possible claims.