# GEN RE CANADIAN PRIVACY POLICY (Revised July 2025)

# **Purpose**

The purpose of this Privacy Policy is to establish a coordinated approach for handling personal information in compliance with applicable laws and regulations in Canada, including the Act respecting the protection of personal information in the private sector, QLR c P-39.1. This policy outlines how the Canadian Branches of General Reinsurance Corporation and General Re Life Corporation (together, "Gen Re") collects, uses, discloses, and protects personal information to ensure the privacy and security of individuals' data.

### Scope

This Privacy Policy applies to all individuals, resident in Canada, whose personal information is collected, used, modified, stored, disclosed and destroyed by Gen Re, including customers, employees, contractors, and any other individuals whose data we handle.

## **Type of Information**

Gen Re collects various types of personal information when it is provided to us by our clients, subject to terms and conditions of our reinsurance agreements with those clients, including but not limited to:

- Names
- Addresses
- Dates of Birth
- Health information
- Employment details

#### **How We Use Your Information**

We use the information that we collect from our clients in order to provide the services set out in our reinsurance agreements.

### **Security Measures**

To protect personal information, Gen Re implements the following security measures:

- Encryption: All sensitive data is encrypted both in transit and at rest.
- Access Controls: Access to personal information is restricted to authorized personnel who have a reasonable business need access such information.
- **Regular Audits**: We conduct regular audits to ensure compliance with our privacy policies and procedures.
- **Employee Training**: All employees receive training on data protection and privacy practices.

## **Third Parties and Sharing**

Gen Re may share personal information with third parties for the following purposes:

- To provide services requested by individuals.
- To comply with legal obligations.
- To protect the rights and safety of our organization and individuals.

# **Individual Rights**

Individuals have the following rights regarding their personal information:

- Access: The right to access their personal information held by Gen Re.
- Correction: The right to request correction of inaccurate or incomplete information.
- **Deletion**: The right to request deletion of their personal information, subject to legal requirements.
- **Objection**: The right to object to the processing of their personal information.

To exercise these rights, individuals can contact our Data Privacy Officer using the contact information provided below.

#### **Retention of Personal Information**

Gen Re will store personal information for as long as it is needed to provide users and customers with the required services or to meet legal or tax obligations for the minimum period prescribed by the law.

In order to determine the appropriate retention period for personal information stored by Gen Re under user consent, Gen Re will take into account multiple factors to ensure that personal information is not stored for longer than necessary or appropriate period. Such criteria will also include:

- The purpose for which Gen Re holds personal information;
- Legal, tax and regulatory obligations in relation to that personal information;
- Any specific client requests in relation to the deletion of personal information;

Gen Re will promptly delete or anonymize personal information that is no longer needed according to the law.

#### **Transferring Your Personal Information**

We may process, store, and transfer your personal information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your personal information through the laws of the foreign country.

## **Contact Information**

For inquiries, requests, and complaints related to privacy, please contact our designated Canadian Data Privacy Officer:

• Name: Stuart McAlister

• Email: stuart.mcalister@genre.com

• **Phone**: 437-221-0938

• Address: 1 First Canadian Place, Suite 5705, Toronto, ON M5X 1E54

# **Updates and Accessibility**

Gen Re is committed to keeping this Privacy Policy up to date. We will review and update the policy as necessary to reflect changes in our practices or legal requirements. The most current version of the policy will always be accessible and displayed on our website.