Privacy Notice for Video Surveillance by General Reinsurance AG - Cologne

The protection of personal data is of particular importance to us. With this notice, we inform you about the processing of your personal data by General Reinsurance AG in accordance with Regulation (EU) No. 679/2016 — the General Data Protection Regulation ("GDPR"), the Federal Data Protection Act ("BDSG"), other applicable data protection regulations, and the rights to which you are entitled under applicable data protection law in connection with the video surveillance system installed on our premises.

Data Controller – Who Are We?

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

You can contact our Data Protection Officer by mail at the address listed above, with the note "Data Protection Officer," or by email at:DPO_EU@genre.com .

What categories of data do we use, and where do they come from?

The camera systems we use capture images of the immediate surroundings. We therefore process images of all individuals (in particular employees, visitors, and service providers) who are within the camera's field of view.

For what purposes and on what legal basis do we process your data?

We process your personal data in compliance with the EU General Data Protection Regulation (GDPR), the German Federal Data Protection Act (BDSG), and all other applicable laws.

We may rely on our legitimate interests (Art. 6(1)(f) GDPR) when processing the aforementioned personal data. In particular, we process data for the following purposes:

- **Security of our facilities and equipment:** We have an interest in protecting our facilities and equipment from damage and vandalism.
- **Safety of our employees:** We want to ensure the safety of our employees on the company premises and in the underground parking garage, as well as the safety of their property (e.g., vehicles parked in the underground parking garage and in front of the building).
- **Prevention of damage:** We aim to protect ourselves against potential theft of company property.
- **Investigations:** In the event of violations of laws, company policies, or other regulations, we have an interest in thoroughly investigating the circumstances.

In addition, we rely on the special national provision for video surveillance of publicly accessible areas set forth in Section 4 of the Federal Data Protection Act (BDSG).

Categories of Recipients of Personal Data

► Data Processing within the Gen Re Group

If we have received and are processing your personal data for the purposes mentioned above, some of this data may also be processed by affiliates of General Reinsurance AG. This occurs in particular in connection

with general IT services that General Reinsurance Corporation provides to its subsidiaries.

► **External service providers and other recipients**
To fulfill our contractual and legal obligations, we sometimes use external service providers and, in specific cases, disclose personal data to other recipients. In the case of video surveillance, the following are potential recipients:

- IT service providers for the maintenance, operation, and backup of systems and applications, data recovery, and data carrier destruction,
- Audit service providers to conduct internal audits and IT security audits,
- Law enforcement agencies, if we have recorded illegal activities or violations of laws, company policies, or other regulations,
- Security and surveillance service providers, as well as private investigative service providers.

In addition, we will only disclose personal data to third parties if we are legally required to do so.

What rights do you have regarding your data?

► **Right of access, rectification, erasure, restriction of processing, and data portability**
You may request information about the data we have stored about you at the address listed above. In addition, under certain conditions, you may request the correction or erasure of your data. You also have the right to restrict the processing of your data, as well as the right to receive the data you have provided in a structured, commonly used, and machine-readable format and to transmit this personal data directly to another data controller.

► **Right to Object**

If we process your data based on our legitimate interest, you may object to this processing if there are reasons related to your particular situation that speak against the data processing. You also have the right at any time to object to the processing of your personal data for direct marketing purposes.

► **Right to File a Complaint**
You have the option to file a complaint with the Data Protection Officer mentioned above or with a data protection supervisory authority, in particular in the Member State where you reside, where you work, or where the alleged violation occurred.[1] The data protection supervisory authority responsible for us is:

State Commissioner for Data Protection and Freedom of Information, North Rhine-Westphalia P.O. Box 20 04 44
40102 Düsseldorf
Tel.: 0211/38424-0
Fax: 0211/38424-10
Email: poststelle@ldi.nrw.de
Website: www.ldi.nrw.de

Data Transfer to a Third Country

If we transfer personal data to recipients outside the European Economic Area (EEA)—for example, as part of intra-group transfers to the United States of America—the transfer will only take place to the extent that

[1] You can find the contact information for all European data protection authorities on the European Commission's official website at: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

- the third country has been confirmed by the European Commission to have an adequate level of data protection (so-called adequacy decision),
- a recipient in the U.S. is certified under the EU-U.S. Data Privacy Framework[2] , or
- other appropriate data protection safeguards (e.g., binding corporate rules or EU Standard Contractual Clauses[3]) are in place.

For data transfers within our corporate group, we have entered into an internal data processing agreement with all affiliated companies that specifically incorporates the EU Standard Contractual Clauses and similar clauses in accordance with applicable national data protection laws. You may request detailed information on this matter, as well as on the level of data protection provided by recipients in third countries, using the contact information provided above.

Duration of Data Storage

We store your personal data for as long as necessary for the respective purpose(s) or as long as we are legally required to do so. We delete your personal data as soon as it is no longer necessary for the aforementioned purpose(s).

Video surveillance recordings are generally stored for 72 hours. Should we record violations or other incidents that require further investigation, we will store these specific recordings for as long as necessary to conduct the investigation, particularly to clarify and provide evidence of the recorded events. In this regard, we rely on our legitimate interest (Art. 6(1)(f) GDPR).

Data Security

We have implemented appropriate data security measures designed to prevent your personal data from being accidentally lost or used or accessed in an unauthorized manner, including the encryption of this information and the implementation of controls intended to restrict access to your personal data.

We have also established procedures for handling suspected data security breaches. We will notify you and/or a competent supervisory authority of a suspected data security breach if we are legally required to do so, within the timeframes prescribed by law .

[2] You can find more information about the EU–US Data Privacy Framework here: https://www.dataprivacyframework.gov/s/data-protection-authorities

[3] You can find more information about the EU Standard Contractual Clauses here: https://commission.europa.eu/publications/standard-contractual-clauses-international-transfers_en