



**Policy regarding the protection of personal data
within CCR RE**

Who are we?

Created in 2016, CCR RE is a reinsurance company governed by the French Insurance Code. A private limited company, its capital, amounting to EUR 109 106 900, is owned 75% by the SMABTP and MACSF consortium and 25% by Caisse Centrale de Réassurance (CCR).

CCR RE covers a wide range of Life, Non-Life and Speciality risks in nearly 80 countries, as well as Natural Disaster risks worldwide. The security of the full range of CCR RE's reinsurance is underpinned by the stability of both its underwriting policy and its teams.

CCR RE carries out its reinsurance activity. It has two branches overseas (Canada and Malaysia) and a representative office in the Lebanon plus a Luxembourg captive reinsurance subsidiary and three subsidiaries whose main activity is real estate.

Its registered office is located at:

6 rue Favart
75002 Paris
France

CCR RE and the protection of personal data

CCR RE is very mindful of the protection of individuals' personal data ("The data subjects") that appears in such processing. This undertaking reflects the special care that it gives, in addition to its employees and lessees, to the people whose personal data is required to be provided to it by its clients, partners and service providers.

To ensure that it provides the best information about the processing of this data, CCR RE has drawn up this Personal Data Protection Policy (the "Policy"). It applies to all personal data that it collects, either directly from the data subjects, or indirectly through its clients, partners and service providers.

Who is the Data Controller?

CCR RE is responsible for processing personal data (hereafter the "personal data") for which it has defined the purposes and the resources, in accordance with Regulation (EU) 2016/679 of 27 April 2016 relating to the protection of natural persons with regard to the processing of personal data and the free movement of such data (the "GDPR").

CCR RE and CCR are jointly responsible for certain personal data processing operations. They have entered into a joint responsibility agreement. The DPO of CCR and CCR RE is designated as the contact point for the receipt and processing of requests to exercise the rights of data subjects.

How is personal data collected?

Personal data processed by CCR RE is collected either directly from data subjects or indirectly through its clients, partners and service providers.

In the context of its reinsurance activity, CCR RE's clients are specifically insurance and reinsurance companies ("the cedents"). CCR RE receives premiums from these cedents in exchange for which it pays them part of their claims. It therefore has no direct (contractual, financial or other) relationship with the insureds and third-party victims, about whom these companies might provide it with certain personal data.

In 2016, CCR RE appointed a Data Protection Correspondent and then in 2018 a Data Protection Officer who is bound by professional secrecy and is subject to an obligation of confidentiality in performing his duties.

Any question or request related to the processing of personal data by CCR RE must be sent directly to CCR RE’s Data Protection Officer.

On what legal grounds do we process your personal data?

The legal grounds for processing personal data are set in Article 6 of the GDPR.

Areas	Legal grounds
Market reinsurance	Processing necessary for the legitimate purposes pursued by CCR RE, its cedents and their insureds, and the third party victims (other than bodily injury). Processing necessary for the performance of a legal obligation to which CCR RE is subject. Consent of an insured or a third party that is a victim of a bodily injury (to be obtained by the cedent prior to the transfer of the risk in accordance with a legal or contractual obligation).
Employee data management	CCR RE's legitimate interest in organizing the recruitment of candidates for a post.
Rental management	Processing necessary for the performance of the rental agreement. Processing necessary for the performance of a legal obligation to which CCR RE is subject.
CCR RE's relations with its service providers	Processing necessary for the performance of contracts with service providers.
Extranet sites	Processing necessary for the purposes of the legitimate interests pursued by CCR RE.
Website	Processing necessary for the purposes of the legitimate interests pursued by CCR RE. Consent for cookies.
Filtering mechanism (AML/CFT, international sanctions)	Processing necessary for the performance of a legal obligation to which CCR RE is subject. Processing necessary for the purposes of the legitimate interests pursued by CCR RE.

How do we process your personal data?

Your personal data is collected for specified, explicit and legitimate purposes and is not subsequently processed in a manner that is incompatible with these purposes. It is also adequate, relevant and limited to what is necessary in relation to these purposes.

Only people who need to process your personal data in order to perform their duties can access it. The processing in which your personal data appears is recorded in a personal data processing register, in accordance with the GDPR, which is not accessible to you.

What is the purpose of processing your data?

Areas	Data processed	Purposes
Market reinsurance	Civil status, Identity, identification data. Professional life. Economic and financial information. Private life Health data.	Taking out, managing and performing reinsurance treaties. Assessment, acceptance, control and monitoring of the risk. Payment of claims. Compilation of statistics, data analysis and actuarial studies. Research and development activities. Compliance with the applicable regulations (including the setting up of regulatory provisions and other capital requirements).
Employee data management	Civil status, Identity, identification data. Professional life. Private life. Economic and financial information.	Documentation with a view to possible recruitment.
Rental management	Civil status, Identity, identification data. Professional life. Private life. Economic and financial information.	Entering into and performance of the lease from the date that it is entered into until its expiry. Management of the relations between CCR RE and its lessees.
Relations with its service providers	Civil status, Identity, identification data Professional life	Management of the contacts between CCR RE and its points of contact within its service providers, in all of CCR RE's areas of activity.
Extranet sites	Civil status, Identity, identification data.	Management of online spaces dedicated to market reinsurance.

	Professional life.	
Website	Civil status, identity, identification data. Professional life.	Management of a public site on the governance, mission and activities of CCR RE.
Filtering mechanism (AML/CFT, international sanctions)	Civil status, identity, identification data. Professional life. Economic and financial information Private life.	Detection of any money laundering or financing of terrorism operation. Avoid paying, via a cedent, sums to a person subject to an international sanction.

How long is your personal data stored?

Your personal data is stored for a period not exceeding that needed for the purposes for which it is processed or for any other authorised purposes. Because of the specific nature of the insurance and reinsurance sector, CCR RE is required to keep certain personal data of insured persons and third party victims beyond the period of the reinsurance contract plus the applicable statutory limitation period.

Also, CCR RE may keep your personal data for a longer period, once aggregated or anonymised, as such data is then no longer governed by the GDPR.

Who are the recipients of your personal data?

In respect of the purposes set forth, the list of recipients authorised to know your personal data is strictly limited. It concerns the relevant departments of CCR RE and its subsidiary companies, plus those of any of their service providers and subcontractors.

In addition, CCR RE can transmit your personal data to any court, any regulatory or control authority as well as to any public authority, should this be required.

Where is your personal data hosted?

Personal Data is hosted almost entirely in France, and secondarily in an European Union country, a country providing an adequate level of protection or a third country with appropriate guarantees.

Is your personal data transferred outside the European Union?

Whenever possible, we give preference to subcontractors located within the European Union. However, we may transfer your data outside the territory of the European Union. These transfers are operated in accordance with the provisions of the GDPR and we put in place all the guarantees required to secure your personal data.

More particularly, in the context of its reinsurance activity, CCR RE transfers personal data to its Canadian branch and to its representative office in Lebanon, which are located outside of the

European Union. Transfers to Canada, which is a State ensuring an adequate level of protection in the event of the transfer of personal data associated with a professional activity, do not require specific and appropriate safeguards. In March 2017, CCR RE (registered office) entered into standard data protection clauses with its representative office in Lebanon.

For more information about data transfers outside the European Union, you can contact CCR RE's Data Protection Officer:

- by post: CCR RE - Protection des données personnelles - 6 rue Favart - 75002 Paris - France
- by e-mail: droit.daces@ccr-re.fr.

What are your rights regarding the personal data collected?

You can exercise a certain number of rights with CCR RE, which will consider your request and reply to you within the applicable legal time frames:

- the right of access (Article 15 of the GDPR) enables you to obtain from CCR RE the personal data concerning you, in accessible format, as well as any available information regarding its origin, and to question CCR RE regarding to your personal data and its processing.

- the right to rectification (Article 16 of the GDPR) enables you to have CCR RE rectify any personal data concerning you, when it is inaccurate.

- the right to erasure (right to "be forgotten") (Article 17 of the GDPR) allows you to obtain the erasure of the personal data concerning you when:

- ✓ your personal data is no longer necessary in relation to the purposes for which it was collected or processed;
- ✓ you withdraw your consent and there is no other legal ground for the processing;
- ✓ you object to the processing and there are no overriding legitimate grounds for the processing;
- ✓ your personal data has been unlawfully processed;
- ✓ your personal data has to be erased to comply with a legal obligation.

- the right to object (Article 21 of the GDPR) enables you to object, at any time, for reasons relating to your particular situation, to the processing of personal data concerning you when the processing is based on your consent or CCR RE's legitimate interest, or when your personal data is processed for marketing purposes.

- the right to restriction of processing (Article 18 of the GDPR) allows you to obtain from CCR RE the restriction of processing when:

- ✓ you contest the accuracy of your personal data, for a period enabling CCR RE to verify the accuracy of such data;
- ✓ the processing of your personal data is unlawful and you object to its erasure and request the restriction of its use instead;
- ✓ CCR RE no longer needs your personal data for processing purposes, but it is still needed by you for the establishment, exercising or defence of legal rights;
- ✓ you object to the processing, pending the verification regarding whether the legitimate grounds pursued by CCR RE override your own interest.

- the right to data portability (Article 20 of the GDPR) enables you to receive, in a structured, commonly used and machine-readable format, your personal data which you have provided to CCR RE and the right to transmit such data to another data controller without hindrance from CCR RE, when:

- ✓ the processing is based on your consent or on a contract;
- ✓ the processing is carried out by automated means.

Where it is technically possible, you have the right to have your personal data transmitted directly from one data controller to another.

- the right to define the fate of your data after your death and to choose whether CCR RE communicates (or not) your data to a third party that you have previously designated (article 85 of the French Data Protection Act). In the event of your death, and in the absence of any instructions on your part, CCR RE undertakes to destroy your data, unless its retention is necessary for evidential purposes or to meet a legal obligation.

For any questions or requests relating to the processing of personal data by CCR RE, you can contact the CCR RE Data Protection Officer:

- by post: CCR RE - Protection des données personnelles – 6 rue Favart – 75002 Paris - France
- by e-mail to: droit.dacces@ccr-re.fr

If you wish to exercise your rights, you may be asked to prove your identity in order to prevent fraudulent requests.

Where applicable, you have a right to complain to the CNIL (French data protection authority) if you consider, after having exercised your rights with CCR RE, that said rights have not been respected:

Commission Nationale de l'Informatique et des Libertés (CNIL)
3 Place de Fontenoy
TSA 80715
75334 Paris Cedex 07
www.cnil.fr/fr

Miscellaneous

This Policy is dated March 5th 2024.

It is accessible from the website of CCR RE and a copy of this Policy can be sent by CCR RE on request.

The information contained in this Policy is provided for information purposes. The information can be subject to amendments, corrections, updates or partial or total deletions at any time without any prior notice from CCR RE, especially to comply with current regulations.