

Privacy Notice

1. We care about your Personal Information

Allianz Risk Transfer AG, Bermuda Branch (“ART,” “we,” or “our”), a part of the Allianz Group, is a Liechtenstein authorized insurance company limited by shares under the Law of 6 December 1995 on the Supervision of Insurance Undertakings (Insurance Supervision Act), and related regulations, each as amended, providing insurance products and services out of Bermuda to insureds in a number of countries. ART is committed to protecting your privacy. This privacy notice explains what type of Personal Information we collect, why it is collected, with whom it is shared, and what rights you have with respect to its use. Please read this notice carefully.

2. What is Personal Information?

“Personal Information” is any information that can be used to identify an individual or that can be linked to an individual, but does not include information about corporate or commercial entities. This term is defined as such under the Bermuda Personal Information Protection Act 2016 (“PIPA”).

3. Responsibility

ART is responsible for Personal Information in its possession or control. ART has designated an individual, a Privacy Officer, as such term is defined under PIPA, to be responsible for compliance with ART’s privacy policies, and has adopted procedures to protect Personal Information, receive and respond to inquiries, train staff accordingly, and communicate our policies to you. ART will monitor ongoing developments to relevant privacy legislation and make changes to our privacy policies as required.

In accordance with the European Union’s General Data Protection Regulation (“GDPR”) and PIPA, ART collects and processes Personal Information. It may be necessary for, or in the legitimate interests of, ART to share your Personal Information with entities within the Allianz Group. In such circumstances, different Allianz entities may have joint access to your Personal Information.

4. What Personal Information will be collected?

In order for ART to provide (re)insurance quotes, (re)insurance policies, and/or handle claims or complaints, ART may collect and process Personal Information about you. Please note that the following list of Personal Information we may collect, while intended to be as complete and accurate as reasonably possible, is not exhaustive and may be updated from time to time in accordance with this notice. The Personal Information we may collect and process includes, but is not limited to:

- Your name, title, date of birth;
- Contact information, including postal address, email address, telephone number;
- Information regarding your dealings with us;
- Occupation and employment details;
- Financial data including bank information, tax information, credit history, and credit score; and
- Criminal conviction data (but only when authorized by law to do so).

In certain circumstances, we may also collect and process “sensitive Personal Information” about you, such as data resulting from your claims history, including information on:

- Race, sex, marital status, physical or mental disability, physical or mental health

ART will only collect, use, and otherwise process sensitive Personal Information where and only to the extent that you have given your consent, unless we are otherwise permitted or required to collect, use, and process such information under aforementioned GDPR and PIPA data protection laws, including but not limited to where this is necessary in connection with contract fulfillment, legal claims, or court proceedings, or for reasons of public interest.

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5. How do we collect and use Personal Information?

ART primarily collects Personal Information through the provision of professional services to clients, including during underwriting and claims handling processes. ART may collect Personal Information from various sources, including:

- Other (re)insurance market participants, such as brokers and intermediaries, reinsurers, and re-insureds;
- Anti-fraud databases, sanctions lists, court judgements, and government agencies; and
- In the event of a claim, third parties, including the other party to the claim (defendant/claimant), claim administrators, loss adjusters and surveyors, lawyers, witnesses, and experts (including medical experts).

ART may use Personal Information for our legitimate business interests, such as the provision and administration of insurance products and related services. Examples of possible uses of Personal Information are:

- (a) To carry out our responsibilities resulting from any agreements you have entered into with us, including to underwrite and assess risks, administer the agreement, and process claims.
- (b) To ensure compliance with regulatory requirements and applicable law, including 'know your client' requirements and sanctions checks, or to comply with any applicable regulatory reporting or disclosure requirements.
- (c) To carry out administrative purposes including, for example, accounting and billing, auditing, and identification checking.
- (d) For data analysis, audits, fraud monitoring and prevention, and otherwise to comply with any applicable legal or regulatory requirements.
- (e) To market our services to you where ART has a legitimate interest or you have consented to us doing so and in accordance with your preferences.
- (f) To define our actuarial, pricing, and underwriting strategies.
- (g) To run our business in an efficient and proper way, including managing our financial position, and in the matters of planning, corporate governance, and audit.
- (h) To contact you to renew the (re)insurance policy.

6. Who will have access to your Personal Information?

ART will ensure that your Personal Information is processed in a manner compatible with the purposes indicated above. Your Personal Information may be disclosed to the following parties who operate as third party data processors under the GDPR and PIPA data protection laws, but only on a "need to know" basis and in compliance with PIPA and GDPR respectively:

- Public authorities, other Allianz Group companies, other insurers, co-insurers, re-insurers, insurance intermediaries/brokers, third party claim administrators, managing general agents, and banks.

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For the above stated purposes, we may also share your Personal Information with the following parties who operate as data processors under our instruction, but only on a “need to know” basis:

- Technical consultants, experts, lawyers, loss adjusters, medical doctors, and service companies to discharge operations (claims, IT, postal, document management); and
- Advertisers and advertising networks to send you marketing communications, as permitted under local law and in accordance with your communication preferences. ART does not share your Personal Information with non-affiliated third parties for their own marketing use without your permission.

Finally, we may share your Personal Information in the following instances:

- In the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in any insolvency or similar proceedings); or
- To meet any legal obligation, including to, if applicable, the relevant ombudsman or applicable supervisory authority, law enforcement agency, or insurance provider if you make a complaint about the product or service we have provided.

7. Where will Personal Information be processed?

Your Personal Information may be processed both inside and outside of Bermuda by the parties specified above, subject always to contractual restrictions regarding confidentiality and the requirements of and obligations imposed by the PIPA and GDPR respectively, and security in line with applicable data protection laws and regulations. We will not disclose your Personal Information to parties who are not authorized to process it.

Whenever we transfer your Personal Information for processing outside of Bermuda by another Allianz Group company, we will do so on the basis of Allianz’s binding corporate rules, known as the Allianz Privacy Standard (“Allianz PS”), which establish adequate protection for Personal Information and are legally binding on all Allianz Group companies, and on the basis of compliance with PIPA and GDPR. The Allianz PS and the list of Allianz Group companies that comply with it can be accessed under www.allianz.com.

In delivering our services to you, it may be necessary to transfer your Personal Information to third parties for the purposes identified in paragraph 5 above, in which event ART will confirm that such third party is located in a country that is deemed to have an adequate level of protection under the applicable data protection laws or otherwise where ART has put in place adequate contractual safeguards to protect the Personal Information in compliance with PIPA and GDPR.

8. What are your rights in respect of your Personal Information?

You have various rights in respect of the Personal Information that we collect, use, disclose, and transfer. These rights are set out below. Should you wish to exercise your rights, please contact us as indicated in paragraph 11 below. With respect to your Personal Information, you have the right to:

- obtain details concerning the processing of your Personal Information, including the data being processed, the purpose of the processing, any recipients of the information, the information source, and the period during which the information will be processed;
- update or correct your Personal Information to ensure accuracy;

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- request that your Personal Information be erased from our records if it is no longer needed for the purposes indicated above;
- request that your Personal Information not be used in advertising, marketing, or public relations;
- file a complaint with us and/or the relevant data protection authority; and
- where you have given us consent to make use of your Personal Information, you are entitled to withdraw said consent.

You may exercise these rights by contacting us as detailed in paragraph 11 below providing your name, email address, account identification, and purpose of your request. Despite a withdrawal of consent or request that Personal Information be erased, ART may continue to process your Personal Information in certain circumstances, including where processing is in compliance with a legal obligation, for reasons of public interest, or for the exercise or defense of legal claims.

9. Security?

ART is committed to maintaining the security of your information. We maintain appropriate technical and organizational security measures to protect your data against loss, misuse, unauthorized access, disclosure, or alternation.

10. How long do we keep your Personal Information?

ART shall only retain your Personal Information for so long as there is a reasonable need to retain it for the purposes set out in this Privacy Notice. According to ART's Record Retention Policy, Personal Information will generally be retained for 10 [ten] years from the date the (re)insurance policy or product expires, a claim has been settled, or the business relationship ends, unless a longer retention period is required or is permitted by law.

11. How can you contact us?

If you have any queries about how we use your Personal Information, or wish to contact us regarding a request under paragraph 8 of this notice, you can reach us by post or email as follows:

Allianz Risk Transfer AG, Bermuda Branch
Overbay, 106 Pitts Bay Road
Pembroke, Bermuda, HM

Email: AGCS-DATA-PROTECTION@allianz.com

12. How often do we update this privacy notice?

This privacy notice is effective as of January 1, 2022 and may be updated periodically as required.