

PRIVACY NOTICE FOR POLICYHOLDERS

BUILDERS REINSURANCE SA (**BUILDERS**) is part of the Builders Insurance Holdings Group. BUILDERS has instituted a comprehensive data protection compliance framework, in line with the Data Protection legislation, in order to fulfil its responsibilities and ensure adequate protection of the personal data of all the individuals it enters into a relationship.

- 1.1 **PERSONAL DATA PROCESSING.** BUILDERS REINSURANCE SA (**BUILDERS**) collects and processes personal data on you when you have taken out, or are an insured party to, an insurance policy with a third-party insurer who reinsures such policy with BUILDERS. BUILDERS acts as the controller of such processing and is committed to respecting your privacy and protecting your personal data in accordance with the law, in particular the EU General Data Protection Regulation 2016/679 (**GDPR**).
- 1.2 **PROCESSING PURPOSES.** The processing of your data is based on the following grounds:

PURPOSE OF PROCESSING	GDPR LEGAL BASIS
BUILDERS processes your personal data: <ul style="list-style-type: none"> - to perform investigation or due diligence in case of claims, - to evaluate and manage risks, fight against fraud, manage disputes and litigation, and - for accounting and administrative management purposes, such as reporting and proceeding to payment of claims. 	The processing is necessary: <ul style="list-style-type: none"> - for purposes of legitimate interests pursued by BUILDERS, and comply with legal obligations

DATA CATEGORIES. In addition to the information you have communicated to your insurance company, intermediary or broker, as required for the purpose of reinsurance, BUILDERS may collect and process personal data regarding you and/or other insurance beneficiaries, where applicable, on insurance claims, including damage to property, health data and liabilities.

- 1.3 **DATA RECIPIENTS.** BUILDERS may share your data with other entities of the BUILDERS group, third-party partners/providers, including: other reinsurance companies, lawyers, counterparties and third parties involved in claims (including witnesses and experts), competent courts, authorities and adverse parties, as necessary to perform operations and deliver services to you and, where required by law, to competent local regulators and authorities.
- 1.4 **DATA TRANSFERS OUTSIDE THE EU/EEA.** BUILDERS may transfer your personal data outside the EU/EEA for its own internal purposes, such as reinsurance protection. However, if an insured person or property is located, or insurance claims or related dispute/litigation take place, outside the EU/EEA, BUILDERS may transfer your data to the relevant jurisdiction, including to countries which do not have a similar level of protection of personal data as the EU. In such case, and in accordance with GDPR, data transfers will:
- a. be limited to what is necessary to perform a contract with a third-party in your interest, or
 - b. be justified by the establishment, exercise or defence of legal claims, or
 - c. if appropriate, be covered by appropriate safeguards, such as entering into EC approved standard contractual clauses.
- 1.5 **DATA RETENTION.** BUILDERS will retain your personal data for as long as required by applicable law (which can vary between 10 and 40 years after the expiry of the policy for which you are a policyholder or insured party, or BUILDER's reinsurance thereof).

- 1.6 YOUR STATUTORY RIGHTS. You have certain rights concerning your personal data under GDPR as mentioned below, and can exercise them by contacting BUILDERS' Data Protection Officer at [dpo@builders.lu].
- a. **Right to information.** As a reinsurance company, BUILDERS has no direct relation with you, may not have your current details and thus cannot contact you conveniently and in confidentiality. You can find updated information on BUILDERS' processing of your data at any time on this website <http://buildersre.lu/>, or by contacting BUILDERS' Data Protection Officer at [dpo@builders.lu].
 - b. **Access right.** You have the right to get access to your personal data.
 - c. **Right to rectification.** You can ask BUILDERS to rectify, correct or update inaccurate and/or incorrect data.
 - d. **Other rights.** In certain limited cases (in which case BUILDERS will first analyse whether the conditions for the exercise of such rights are fulfilled, in line with GDPR), you may object to, or request the limitation of, the processing of your personal data, or request the erasure or portability of your personal data. Where you have given your consent to specific processing, you have the right to withdraw such consent (for future processing). You should note that the law authorizes BUILDERS to retain and continue processing certain personal data, even where you have exercised your rights to object or to ask for erasure or -if applicable- withdraw your consent: this is the case in particular where BUILDERS has legitimate and compelling reasons for continuing the processing, such as compliance with applicable law. Finally, you can contact the Luxembourg data protection authority (*Commission nationale pour la protection des données* - <https://cnpd.public.lu/en.html>) to lodge a complaint.
- 1.7 DATA PROTECTION OFFICER. BUILDERS has appointed a data protection officer, who can be contacted at [dpo@builders.lu].