

Hannover Rück SE Shanghai Branch

Personal Information Protection Policy

Last Updated Date: March 31, 2025

Introduction

Hannover Rück SE, Shanghai Branch (hereinafter referred to as "**we**") highly values the protection of personal information and individuals' rights and strictly complies with the provisions of the *Personal Information Protection Law* (hereinafter referred to as the "**PIPL**") of the People's Republic of China ("**PRC**") and other data protection laws and regulations of the PRC. Through this *Hannover Rück SE Shanghai Branch Personal Information Protection Policy* (hereinafter referred to as this "**Policy**"), we explain to you (including but not limited to a policyholder, contracting party, claimant, beneficiary, broker, stakeholder, investor, supplier, visitor, participant in an event, as well as a contact person of any of the aforementioned groups) how we collect, store, use, entrust a third-party to process, share, transfer and publicly disclose your personal information, and also clarify your relevant rights to personal information, such as to access, copy, transfer, rectify, supplement, delete, restrict the processing of your personal information, withdraw consent for our processing of your personal information, and delete your account.

Please be advised that when you access any of our platforms (such as our website), use related services, or proactively contact us, your provision of personal information indicates that you have acknowledged and agreed to our processing of your personal information in accordance with this Policy. If you do not agree to the processing of your personal information as described in this Policy, we may be unable to provide certain services or products for you.

This Policy will help you understand the following contents:

1. Processing Purpose and Scope of Personal Information

2. Entrusted Processing, Sharing, Transfer and Public Disclosure
3. Storage Location and Cross-Border Transfer of Personal Information
4. Protection Measures and Retention Period of Personal Information
5. Your Rights as a Personal Information Subject
6. Protection of Children's Personal Information
7. Protection Requirements in Specific Countries/Regions
8. Updates and Revisions to This Policy
9. Our Contact Information

This Policy is formulated in accordance with current data protection laws and regulations of the PRC. The term "*personal information*" as used in this Policy refers to various types of information, recorded electronically or otherwise, that relate to an identified or identifiable natural person, excluding anonymized information. Personal information includes "*sensitive personal information*" as defined under the data protection laws and regulations of the PRC, which refers to personal information that, if disclosed or misused, could easily result in the infringement of an individual's dignity or the endangerment of his/her personal or property security, including the biometric data, religious beliefs, specific identities, medical and health information, financial accounts, tracking data etc., and the personal information of minors under the age of 14.

You acknowledge and understand that certain services we provide may require the processing of your sensitive personal information. In this Policy, we have highlighted such sensitive personal information in **bold**. Its collection and processing are strictly limited to the extent necessary to achieve the basic functions of relevant products and services, fulfill our legal obligations, or perform contractual duties, and have been limited to the minimum necessary extent. We will process your sensitive personal information only for the purposes described in this Policy, based on your explicit consent, to provide services, or to fulfill legal obligations. Such processing will not adversely affect your legitimate rights and interests.

In addition, as a branch of Hannover Rück SE, we must comply with the *General Data Protection Regulation* (GDPR). For the group privacy policy issued by Hannover Rück SE in accordance with the GDPR, please refer to the following:

[Data Privacy: Our Commitment to Safeguarding Your Data - Hannover Re](#)

Unless otherwise specified, the definitions of relevant terms and expressions used in this Policy shall have the same meaning ascribed to them under the data protection laws and regulations of the PRC.

1. Processing Purpose and Scope of Personal Information

As a reinsurance entity, we need to collect and process the personal information of cedants (hereinafter referred to as "**Clients**"), suppliers, partners, insured persons, beneficiaries and claimants of relevant policies, as well as other relevant parties to accurately assess risks related to reinsurance business and manage and optimize our services. **We normally do not directly collect personal information from individual insurance customers, and instead may lawfully collect your personal information from the following sources for the purposes of reinsurance business:**

- 1) Insurance companies that have business with us;
- 2) Insurance brokers and other intermediaries;
- 3) Other reinsurers or retrocessionaires;
- 4) Third-party claims handlers or service providers, including witnesses, claims service providers, inspectors, and surveyors;
- 5) Data from publicly accessible sources, particularly for scenarios such as for the evaluation of large losses, etc.

The above-mentioned entities that conduct business with us will provide us with your personal information only after informing you and obtaining your authorization and consent, except where consent is not required by law or regulations. If laws and regulations require us to obtain your consent for processing certain personal information, we will obtain your consent in advance, either directly or through our partners.

In addition, we may collect relevant publicly available information from other third parties (such as relevant authorized institutions, regulatory authorities, government departments, industry self-regulatory organizations, and other

organizations). Such situations typically occur when we fulfill our legal obligations related to anti-money laundering and the prevention of other financial crimes.

We process your personal information only to the extent necessary for conducting reinsurance business and solely for the purposes for which the information was originally collected, as well as other related lawful purposes. This is to accurately assess risks related to reinsurance business and manage and optimize our services. **Specifically, we may process your personal information for the following purposes:**

- 1) To conduct reinsurance business and fulfill obligations under reinsurance contract;

In order to fulfill obligations under reinsurance contracts such as underwriting, coverage, and claims, and conduct data analysis for risk assessment and pricing, if you are an individual related to the party that purchases the insurance (insured person, policyholder, beneficiary, claimant, etc.), under necessary circumstances, we may need to collect, process, and use personal information related to you, including **policy numbers, claim numbers**, and personal information contained in policy and claim documents, including but not limited to your name, gender, date of birth, age, home address, email address, phone number, job information, vehicle identification information, location information, **identification information (such as identification documents or numbers), property information, and health and physiological information**.

- 2) To conduct Client activities and provide Client support;

To contact you or provide event-related support, if you are a contact person or a participant in an event of our Client, under necessary circumstances, we may need to collect, process, and use your name, email address, phone number, company, job title, and event/meeting time and location, in order to communicate with you and facilitate event-related services.

- 3) To fulfill legal obligations under laws, regulations, and supervisory requirements;

To fulfill the legal obligations of financial institutions regarding “Know Your Client”, anti-money laundering, and counter-terrorism financing etc., or to assist government and regulatory authorities in investigations and cooperate with judicial enforcement, if you are an individual related to the party that purchases the insurance (insured person, policyholder, beneficiary, claimant, etc.), under necessary circumstances, we may need to collect, process, and use your name, gender, date of birth, home address, phone number, nationality, job, **identification numbers, account information, and health and physiological information**, etc. According to regulatory requirements, we will collect the necessary information based on the specific products and services you need. The specific types of information collected will depend on the relevant requirements regarding the actual product or service.

- 4) To receive products and services from suppliers or partners;

For the procurement of products, services, and external collaborations, if you are a contact person for a supplier or partner, under necessary circumstances, we may need to collect, process, and use your name, email address, phone number, company and job title, etc.

If we intend to process your personal information for purposes other than those listed above, we will notify you in advance in accordance with applicable laws and regulations and obtain your consent when necessary.

After collecting your personal information, we may compile statistics on the usage of our products and services and may share the statistics with the public or relevant third parties to illustrate the overall operational trends of our products and services. However, such statistics will not contain any information that can identify you. We may use technical measures to de-identify personal information, ensuring that the information after de-identification cannot be used to identify a specific individual without additional information.

We may process your personal information in the following situations, and please be informed that, according to the provisions of relevant laws and regulations, such processing does not require your consent:

- 1) When necessary for the conclusion or performance of a contract with you;
- 2) When necessary to fulfill legal duties or obligations;
- 3) When necessary to respond to public health emergencies or to protect the life, health, and property safety of individuals in emergencies;
- 4) When necessary for public interest purposes, such as news reporting or public opinion supervision, within a reasonable scope;
- 5) The personal information involved is information that you have voluntarily made public to the general public or that has already been legally disclosed, and it is processed within a reasonable scope;
- 6) Any other circumstances as stipulated by laws and administrative regulations.

2. [Entrusted Processing, Sharing, Transfer and Public Disclosure](#)

(1) Entrusting Third Parties to Process Your Personal Information

We may entrust third-party service providers and partners to process your personal information on our behalf. For third parties entrusted to process personal information, we will enter into relevant agreements with them, requiring them to strictly comply with our instructions, this Policy, and relevant laws and regulations, and to implement necessary data protection measures when processing your personal information.

(2) Providing Your Personal Information to Other Personal Information Handlers

When we provide your personal information to other personal information handlers, we will inform you of the recipient's name, contact details, purpose and

method of processing, and types of personal information involved. Where your personal information is processed based on your consent, we will obtain your separate consent as required by relevant laws and regulations. These third parties may include:

- 1) Government regulatory departments and authorities with which we fulfill our notification obligations;
- 2) Competent authorities or dispute resolution bodies (including courts and arbitration institutions);
- 3) Insurance companies, brokerage companies, intermediaries, banks, and other reinsurance companies (reinsurers) that have business relationships with us.

(3) Transferring Your Personal Information

We will not transfer your personal information to any company, organization, or individual, except in the following circumstances:

- 1) We have obtained your explicit consent or received your proactive request;
- 2) When personal information transfers are involved in scenarios such as mergers, divisions, dissolution, or bankruptcy, we will inform you of the recipient's name and contact details and require the new entity, organization holding your personal information to continue adhering to this Policy.

(4) Public Disclosure of Your Personal Information

We will only publicly disclose your personal information in the following circumstances:

- 1) Disclose the specific personal information designated by you in the manner specified by you, based on your request and with your separate consent.
- 2) If we are required to provide your personal information under laws, regulations, judicial proceedings, legal processes, or mandatory administrative enforcement by government authorities, we may publicly disclose your

personal information in accordance with relevant provisions. Upon receiving such disclosure requests, we will require the relevant authorities to issue legal documents to ensure that the request has a legal basis and that the enforcement authorities have the lawful rights and reasonable purposes to obtain your personal information.

3. Storage Location and Cross-Border Transfer of Personal Information

Personal information that we have collected and generated within the PRC will be stored within the PRC. Given the transnational nature of our business and the necessity of conducting reinsurance operations on a global scale, we may utilize international systems and professional resources to provide you with products and services. Consequently, your personal information may be accessed by professionals located outside the PRC or processed within foreign jurisdictions. In such cases, since data protection laws may vary across jurisdictions, we will strictly comply with relevant laws and regulations, taking appropriate measures to ensure that your personal information receives the same level of protection abroad as it does within the PRC. Additionally, we will inform you of the name of the overseas recipient, its contact detail, the purpose and method of processing, the types of personal information involved, as well as the ways and procedures for you to exercise your rights under the PIPL against the overseas recipient, and we will obtain your separate consent.

4. Protection Measures and Retention Period of Personal Information

We will comply with applicable laws, regulations, and regulatory requirements by implementing appropriate technical and managerial measures to protect the personal information we collect and process, preventing unauthorized access, leakage, alteration, or loss of personal information.

We will securely store your personal information in accordance with data retention regulations for the period necessary to achieve the purposes described in this Policy or as required by laws and regulations. We delete or anonymize your personal data as soon as they are no longer needed for the aforementioned

purposes. The specific retention period generally depends on the duration of your policy and relevant regulatory requirements. Once your personal information exceeds the retention period, we will delete or anonymize it. If we cease providing services or terminate our operations, we will notify you in advance and delete or anonymize your personal information after termination. However, if laws, regulations, rules, normative documents, government policies, or orders of the PRC stipulate otherwise, or if we need to retain your personal information to fulfill our compliance obligations, the aforementioned restrictions of processing methods will not apply.

5. Your Rights as a Personal Information Subject

We highly value your concerns regarding personal information and are committed to fully safeguarding your rights related to personal information, including the rights to access, copy, transfer, rectify, supplement, delete, restrict the processing of your personal information, withdraw consent for our processing of your personal information, and delete your account. We will ensure that you have the full capacity to exercise these rights to effectively protect the security and lawful rights and interests of your personal information.

1) Your Rights Over Your Personal Information

- You have the right to access and copy your personal information.
- You may request the transfer of your personal information to another personal information handler of your choice. However, this right can only be exercised if the following conditions set by the Cyberspace Administration of China (CAC) are met (that we can verify your identity; the personal information being transferred is either voluntarily provided by you or collected based on a contract; the transfer is technically feasible; the transfer does not infringe upon others' legal rights). Please note that if your requests for the right to transfer your personal information exceed a reasonable limit, we may charge the necessary fee based on the cost of transferring the personal information.

- If you find that your personal information is inaccurate or incomplete, you have the right to request rectifications or supplements.
- Under specific circumstances (the processing purpose has been achieved, cannot be achieved, or is no longer necessary; we stop providing products or services, or the retention period has expired; you withdraw your consent; or we process your personal information in violation of laws, regulations or agreements etc.), you may request the deletion of your personal information. Please note that if the legally mandated retention period has not expired, or if the deletion is technically unfeasible, we will not immediately delete your personal information but will cease processing it beyond storage and necessary security measures.
- You have the right to decide on the processing of your personal information, including the right to restrict or refuse our processing of your personal information.
- If the processing of your personal information is based on your consent, you have the right to withdraw your consent. Your withdrawal of consent will not affect the validity of the personal information processing activities carried out based on your consent before the withdrawal.
- If you decide to stop using our products or services and need to delete your account, you may contact us to submit a deletion request. Before deleting your account, please ensure that you have properly handled any agreements made with us and our relevant partners, and that there are no outstanding disputes.
- In certain business functions, we may rely on a non-human automated decision-making mechanism, including information systems and algorithms, to partially automate the processing of your personal information in order to support our employees' decision-making in certain situations. If we rely solely on automated decision-making mechanisms to process your information in the future, we will notify you in advance so that you can maintain your rights accordingly. If such decisions significantly affect your legitimate rights and interests, you have the right

to request an explanation from us and the right to refuse decisions made solely through non-human automated decision-making mechanisms. We will also provide appropriate remedies, provided that doing so does not infringe upon our trade secrets, the rights and interests of other users, or the public interest.

- You have the right to be informed about the processing of your personal information, and you have the right to request an explanation from us of the information processing and this Policy. If you have any objections to our personal information processing activities or this Policy, you have the right to contact us to file a complaint or suggestion.

In addition to the rights listed above, you also have the right to file a complaint or report to regulatory authorities and reserve the right to protect your personal information rights and interests through legal channels, including but not limited to filing a lawsuit with a people's court.

2) Our Response to Your Requests

You can contact us through the section "Our Contact Information" at the end of this Policy to exercise the aforementioned rights as a personal information subject. To safeguard the security of your information, we may require you to submit a written request or provide other forms of identity authentication. Upon receiving your request, we may first ask you to complete identity authentication. We will then respond to your request regarding personal information rights in a timely manner, in accordance with relevant laws, regulations, and the prescribed time limits.

For your reasonable requests, we will not charge any fees in principle. However, for multiple repeated requests or requests that exceed a reasonable limit, we may charge a certain cost based on the situation. Requests that are unwarrantedly repetitive, require excessive technical measures (e.g., requiring us to develop a new system or to fundamentally change the existing practices), pose risks to others' legitimate rights, or are highly impractical may be rejected.

Please note that within the scope permitted by laws and regulations, we may be unable to respond to your request to exercise your rights under the following circumstances:

- If your request contradicts our obligation to comply with legal and regulatory requirements;
- If the requested information is directly related to national security or national defense security;
- If the requested information is directly related to public security, public health, or major public interests;
- If the requested information is directly related to criminal investigations, prosecutions, trials, or the enforcement of judgments;
- If we have sufficient evidence proving that you have subjective malice or are abusing your rights;
- If it is necessary to protect your or another individual's life, property, or other major legitimate rights, but it is difficult to obtain your authorization and consent;
- If responding to your request would cause serious harm to your or other individuals' or organizations' legitimate rights and interests;
- If the requested information involves trade secrets.

6. Protection of Children's Personal Information

We highly value the protection of the personal information of children (i.e., minors under the age of 14). In accordance with the *Regulations on the Protection of Children's Personal Information Online* and other relevant laws and regulations, if you are under the age of 14, please read this Policy under the guidance of your parents or other guardians and provide personal information only with their involvement.

If it is necessary to collect children's personal information, we will obtain prior consent from the parents or other guardians. Children may provide personal information to us only after the explicit consent has been obtained. Any children's personal information collected with consent will only be used as permitted by law, explicitly authorized by parents or other guardians, or when necessary to protect the children.

When you, as a parent or other guardians, provide us with a child's personal information, it is deemed that you consent to our processing of such information in accordance with this Policy and relevant laws and regulations. If we discover that we have collected children's personal information without prior consent, we will promptly delete the relevant data.

We are committed to strictly complying with applicable laws and regulations to ensure the security and lawful rights of children's personal information. If you have any questions regarding our processing of personal information of a child under your guardianship, please contact us using the details provided in this Policy.

[7. Protection Requirements in Specific Countries/Regions](#)

If specific legal requirements or practical circumstances in certain countries/regions require us to follow special regulations when processing your personal information, you may visit the dedicated section on our website for that country/region to review the special provisions regarding the processing of your personal information in that area.

[8. Updates and Revisions to This Policy](#)

We reserve the right to update or revise this Policy within the scope permitted by applicable laws to accommodate changes in legal, technological, and commercial environments. The updated version of the Policy will be published on the publicly accessible page of our company's official website, and your personal information will always be subject to the latest version of the Policy. If you continue to use our services or products after the changes to the Policy have come into force, it will be deemed that you agree to and accept the revised Policy. You

can check the "Last Updated Date" at the beginning of this Policy to understand when it was last modified. In the event of a significant update (as defined below), we will notify you through prominent means (such as email). Additionally, we will archive previous versions of this Policy for your reference at any time.

"Significant Updates" include:

- Significant changes in our service model, such as changes in the purposes of processing personal information, the types of personal information processed, or how personal information is used.
- Major changes in our ownership structure or organizational structure, such as ownership changes due to business restructuring, bankruptcy, mergers, etc.
- Changes in the primary recipients of personal information shared, transferred, or publicly disclosed.
- Significant changes in your rights regarding personal information processing and how you exercise them.
- Changes in our department responsible for personal information protection, contact information, or complaint channels.
- A personal information protection impact assessment report indicating high risks.

9. Our Contact Information

If you have any questions, feedback, or suggestions about this Policy, you can contact us through the insurance company that serves you or your designated contact team at our company. Alternatively, you may contact our **Data Protection Officer (DPO)**:

Email: Privacy_China@hannover-re.com

Mailing Address: Data Protection Department of Hannover Rück SE, Shanghai
Branch

6th F, 1188 Minsheng Road, Shanghai Pilot Free Trade Zone, Shanghai, PRC;

Zip code: 200135