

# Convex Re Limited Privacy Notice

Convex Re Limited is committed to protecting your privacy and ensuring that your personal information is collected and used appropriately, lawfully, and transparently. This notice sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

## **This Privacy Notice explains:**

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## 1. Who we are?

Convex Re Limited (CRL), which is authorised and regulated by the Bermuda Monetary Authority (BMA) as a class 4 reinsurer;

## 2. What is our Role?

CRL is a Data Controller. This means we make decisions about processing activities. Convex exercises overall control of the personal data being processed and are ultimately in charge of and responsible for the processing of data. We may share personal information with other parties to assist in our business activities. These parties are known as processors. Processors act on behalf of Convex under our authority.

## 3. Our Data Protection Standards

As an international reinsurer based in Bermuda, CRL will apply the standards set in the Personal Information Privacy Act (PIPA) 2016 which takes effect on 1 January 2025.

We are regulated for data protection and privacy by the Privacy Commissioner's Office Bermuda.

## 4. About the reinsurance market

Reinsurance is insurance for insurance companies. It's a way of transferring some of the financial risk insurance companies assume in insuring their lines of business. These risks can range from retail cover such as motor, home, etc or larger risks such as shipping, aerospace, etc. It is common practice for insurance companies to mitigate their risks through reinsurers.

## 5. What personal information we collect

As a reinsurer CRL, will in some instances be provided with personal data of the of individuals that form part of the reinsurance contract. This data may be processed in connection with the underwriting and/or claims processes. We will also collect and process personal data from insurers, and brokers during the course of conducting business.

We will also collect the personal data of those individuals that apply for roles within CRL.

The type of personal information we may collect will depend on the purpose for which it is collected but may include:

- Information to verify your identity such as passport details, driving licence and national insurance number.
- Previous occupation and employment history, job title and professional accreditations.
- Family, lifestyle, health, and financial information.
- Information relating to criminal and/or civil offences.
- General information such as your name, address, contact phone numbers and email addresses, date of birth and gender.

- Information about your relationship to the policyholder where you are the beneficiary.
- Bank account and payment details.
- Any financial information about you which we have obtained as a result of conducting credit checks such as bankruptcy orders, individual voluntary arrangements or county court judgments.
- Information which we obtain as part of checking sanctions lists, such as those published by United Nations, European Union, UK Treasury, the Bermuda Ministry of Legal Affairs Financial Sanctions Implementation Unit, the U.S. Office of Foreign Assets Control (OFAC), the U.S. Department of Commerce and the U.S. Bureau of Industry and Security.
- Any information which is relevant to your reinsurance application such as previous reinsurance policies you have held and claims you have made. This will also include any information specific to the type of policy the insurer is applying for, as an example, if you are applying for reinsurance policy related to the health of underlying individuals we may collect and use information which relates to the specific insureds.
- Information which we have gathered from publicly available sources such as the electoral roll, newspapers, referrals from current or past colleagues and social media sites.
- Any other information passed on to CRL as part of the reinsurance contract or job application by third parties.

## 6. Sensitive Data

Sometimes we will need to collect and process, sensitive personal data (which is information relating to your place of origin, race, colour, nationality or ethnic origin, sex, sexual orientation, sexual life, marital status, physical or mental disability, physical or mental health, family status, religious beliefs, political opinions, trade union membership, biometric information or genetic information). As an example, we may need access to information about your health in order to provide your insurer with a quote for the cost of the reinsurance, or process any claims made by the insurer. We may also need details of any unspent criminal convictions you have for employment purposes. When we require the collection of sensitive data, we will rely on the consent you provided to your insurer to process this information or where we deal directly with you, your specific consent.

## 7. How will we collect your personal data?

We will collect personal data from **insurers** when:

- they apply for or renew a reinsurance contract with us; and
- we are providing an insurer with a quotation for the cost of the reinsurance;

We will collect personal data **directly** when:

- an insurer contacts us by email, telephone and through other written and verbal communications;
- an insurer visits us in person, we will retain their personal details and summaries of our discussions;
- we engage in telephone or video conferencing;
- you apply for a role within our organisation; and

- you contact our third-party administrators by telephone (please note that call recording may be used).

As well as obtaining information directly, we will collect information from:

- third parties involved in the reinsurance application process (such as our outsource provider, business partners and representatives, brokers, or insurers);
- recruitment agencies, who you have engaged;
- publicly available sources such as the electoral roll, court judgments, insolvency registers, internet search engines, news articles and social media sites;
- third parties we employ for pre-employment checks which will include searching your details through credit reference agencies; and
- financial crime detection agencies and insurance industry databases which we employ for checks for fraud prevention and checking against international sanctions.

## **8. On what basis do we collect and process your data?**

We will process your data for multiple purposes, dependent on your needs. Data will only be processed where we have a legitimate interest in processing your data.

We will process your personal data:

- In the pursuit of entering into or the administration of a reinsurance contract e.g. regulatory or legal checks required by our regulators and local and international law.
- Where we are obliged to use personal data as defined by law or regulation e.g., where regulation requires us to hold certain records on our dealings with you.
- Where we use your data as part of our wider business records and analysis e.g., for future planning and improving our network, products, and services.
- Where you are applying for a role within CRL, where we need to complete pre-interview/employment checks.
- As part of a process required to assess or fulfil a claim.

## **9. Who will we share your personal data with?**

We will keep your personal data confidential, and we will only share it where necessary for the purposes set out above with the following parties:

- Third parties involved in the administration of the relevant reinsurance policies or claims. These include loss adjusters, claims handlers, private investigators, accountants, auditors, banks, lawyers, and other experts including medical experts.
- Third party providers who support our IT infrastructure.
- Insurance brokers and other intermediaries.
- Other reinsurers and companies who arrange such reinsurance.
- Credit reference agencies in Bermuda.
- Third parties who provide sanctions checking services.

- Insurance industry bodies (including the Employers' Liability Tracing Office).
- Financial crime detection agencies and insurance industry databases (such as for fraud prevention and checking against international sanctions).
- Our regulators including the Privacy Commissioners Office, and the BMA.
- The police, Office of the Tax Commissioner, the Ministry of Legal Affairs and other crime prevention and government agencies in Bermuda.
- Third party suppliers, agents and contractors appointed by Convex to help us carry out our everyday business activities including recruitment service providers, IT suppliers, actuaries, auditors, lawyers, document management providers, outsourced business process management providers, our subcontractors and tax advisers.
- Selected third parties in connection with any sale, transfer or disposal of our business.
- Any agent or representative empowered by you to act on your behalf.
- Any other person where necessary to perform any reinsurance contract with you, in order to protect ourselves from risk or to ensure regulatory compliance or good governance.

## **10. Brokers, appointed representatives, suppliers, and other business partners**

If you are a broker doing business with us, an appointed representative or other business partner such as an introducer or supplier, this section will be relevant to you and sets out our uses of your personal data.

We will collect and process personal data including:

- General information such as your name, address, contact phone numbers and email addresses.
- Identification information such as passport details, driving licence and national insurance number.
- Information about your job such as job title and previous roles.
- Information which we obtain as part of checking sanctions lists, such as those published by United Nations, European Union, UK Treasury, the U.S. Office of Foreign Assets Control (OFAC) and the U.S. Department of Commerce, Bureau of Industry and Security.
- Other information (including publicly available information) obtained as part of our due diligence checks.
- If you attend an event with us, we may collect relevant details such as your event preferences and dietary requirements.

In the event that we need to collect sensitive data such as detailed information relating to any criminal convictions (including offences and alleged offences and any court sentence or unspent criminal convictions) we will treat this with enhanced security.

We will collect data from you directly as part of our onboarding processes for business partners and intermediaries. In addition to this we will collect data from:

- Invoices, contracts, policies, correspondence, and business cards.
- Publicly available sources such as internet search engines.
- From service providers who carry out sanctions checks.

We may use your personal data for a number of different purposes. In each case, we must have a “legal ground” to do so. We will rely on the following “legal grounds” when we process your “personal data”:

- We need to use your personal data to enter into or perform the contract that we hold with you. For example, we may need certain information in order to operate our business partnership arrangement.
- We have a legal or regulatory obligation to use such personal data. For example, we may be required to carry out certain background checks.
- We need to use your personal data for a legitimate interest (e.g. to keep business records, to carry out strategic business analysis, review our business planning and to develop and improve our products and services). When using your personal data for these purposes, we will always consider your rights and interests.

## **11. Underwriting activities**

Risk assessment is integral to the offering of underwriting reinsurance. We assess the risk that you would like to insure (e.g., the risk of your home being damaged by a flood) against the likelihood of that event occurring (e.g., based on the geographical location of your property and history of floods in the area). We use this profiling to help us decide whether or not to offer reinsurance, and the terms and the price of the policy. This will likely be completed by your insurer, but they may provide us with personal data such as geodata relating to your property as part of the contract of reinsurance.

## **12. Prospective job applicants**

If you are applying for a job with us, this section will be relevant to you and sets out our uses of your personal data.

The personal data that we will collect from you will include:

- General information such as your name, address, contact phone numbers and email addresses, date of birth and gender.
- Information about your job such as job title and previous roles.
- Information about your right to work.
- Other information (including publicly available information) obtained as part of our due diligence checks.
- In the event you attend events with us, we may collect relevant details e.g., your event preferences, dietary requirements etc.

We will also collect sensitive data including, Information relating to your criminal convictions (including offences and alleged offences and any court sentence or unspent criminal convictions). In the event you attend events with us, we may collect dietary requirements. If your CV contains any trade union memberships these will be collected.

As well as obtaining information directly from you, we will collect information from service providers e.g., recruitment companies you have instructed and social media e.g. LinkedIn. Note, where we receive your CV or and do not offer you a role but consider that you have relevant skills and experience applicable to future roles, we will store it on our files for two years, where we will undertake periodic reviews for suitability against current vacancies unless you object, in which case we will delete it from our files.

We may use your personal data for a number of different purposes. In each case, we must have a “legal ground” to do so. We will rely on the following “legal grounds” when we process your “personal data”:

- We need to use your personal data to enter into or perform the employment contract that we hold with you. For example, we may need certain information to draft an offer of employment.
- We have a legal or regulatory obligation to use such personal data. For example, we may be required to carry out certain background checks.
- We need to use your personal data for a legitimate interest (e.g., to keep your CV on file in case future opportunities arise). When using your personal data for these purposes, we will always consider your rights and interests.

When the information that we process is classed as sensitive, we must have an additional “legal ground”. We will rely on the following legal grounds when we process this category of data:

- We need to use such sensitive data as an example to assess your application including but not restricted to; right to work in Bermuda, whether you have had judgements against unpaid debts, and to provide you with company benefits such as PMI and Pension.
- By agreeing to the application process, you have provided your consent to our use of your sensitive data.

We will keep your personal data confidential, and we will only share it where necessary for the purposes set out above with the following parties:

- Third parties involved in the hosting, analysis and supply of recruitment services.
- Credit reference agencies in Bermuda.
- Our regulators including the BMA and the Privacy Commissioner’s Office.
- The police, office of the tax commissioner and other crime prevention and government agencies.
- Third party suppliers, agents and contractors appointed by Convex to help us carry out our everyday business activities including recruitment service providers, IT suppliers, auditors, lawyers, document management providers, outsourced business providers, our subcontractors, marketing partners, and tax advisers.
- Selected third parties in connection with any sale, transfer or disposal of our business.
- Any agent or representative acting for you.

### **13. Employee data**

We will within the term of your employment we will collect and process your personal data required to maintain your employee status. This will include:

- Records of your name and address.
- Your bank details.
- Records of your performance reviews.
- Details of any disciplinary action.
- Your remuneration packages.
- Any medical conditions that you have informed us about.
- Records of when you enter and leave the building where our offices are located.

In order to run our business and meet our employers' obligations, we will share your personal data with a number of third parties involved in providing you with your remuneration, benefits, and other general employee services.

#### **14. How long do we keep your personal data for?**

We will keep your personal data for as long as reasonably necessary to fulfil the purposes set out in section (7) above and to comply with our legal and regulatory obligations.

We have a detailed data retention policy in place which governs how long we will hold different types of information for. The exact retention period will depend on your relationship with us and the type of personal data we hold, for example:

- If we provide a quote for a policy but this is not taken up by you (or on your behalf) then we hold the associated information for 36 months.
- If you make a claim under a policy we provide, we will keep your personal data for 6 years from the date on which the claim is closed.

If you would like further information regarding the periods for which your personal data will be stored, please contact us at [dataprotectionofficer@convexin.com](mailto:dataprotectionofficer@convexin.com)

#### **15. What is our approach to sending personal data overseas?**

Sometimes we (or third parties acting on our behalf) will transfer personal data that we collect about you to countries outside of Bermuda. Transfers will be between Bermuda and other countries where there are Convex offices (UK, USA, EU, and Guernsey). We may also use outsource partners who are based in jurisdictions outside of Bermuda, whose role is to support Convex in both internal processes such as Human Resource and external business processes.

Where a transfer occurs, we will take steps to ensure that your personal data is protected. We will do this using a number of different methods including:

- Putting in place appropriate confidentiality clauses in our contracts.
- Ensuring that data is only shared where completely necessary.
- Transfers will be completed via secure and/or encrypted systems.
- Our partners will operate under the appropriate data protection and privacy requirements applicable to their jurisdiction and where appropriate that the country/regulatory regime they



operate in. Where we consider it necessary, we will enforce that the third-party complies with the relevant data privacy laws and regulation such as PIPA and GDPR.

## **16. How do we protect your personal data?**

Convex takes security of your information very seriously. We maintain appropriate technical, organisational, and physical safeguards designed to protect personal data we process in accordance with our legitimate purposes and in line with our legal and regulatory obligations. The security measures in place on our website and computer systems are in place to protect from loss, misuse, or alteration of the information you provide to us. We retain your personal data only for as long as reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

Convex has a number of Information Security Standards that apply, these standards cover access controls, encryption, network and host security, physical security, data recovery and business continuity. Our standards change from time to time as we react to market challenges and changing regulatory requirements.

Because e-mails submitted via web-based applications are not protected by the same security measures we use in other areas where we actively collect information, we will only ask you to provide us with basic personal data, such as your contact details, a high-level description of your enquiry e.g., aviation, shipping, etc will be sufficient for us to instigate contact. In the event that you become aware of any actual or potential misuse of any such information or for more information on IT Security please contact us at [dataprotectionofficer@convexin.com](mailto:dataprotectionofficer@convexin.com)

## **17. Your rights**

Under PIPA you have a number of rights in relation to the personal data that we hold about you which we set out below. You can exercise your rights by contacting us at any time using the details set out in section 20. We will not usually charge you in relation to a request.

Please note that although we take your rights seriously, there may be some circumstances where we cannot comply with your request such as, complying with it would mean that we couldn't comply with our own legal or regulatory requirements. In these instances, we will let you know why we cannot comply with your request.

In some circumstances, complying with your request may result in your insurance policy being cancelled or your claim being discontinued. For example, if you request erasure of your personal data, we will not have the information required to pay your claim. We will inform you of this at the time you make a request.

Under Part 3 of PIPA you are entitled to a copy of the personal data we hold about you subject to certain restrictions. We will usually provide your personal data to you in writing unless you request

otherwise. Where your request has been made electronically (e.g., by email), a copy of your personal data will be provided to you by electronic means where possible.

We take reasonable steps to ensure that the information we hold about you is accurate and where necessary up to date and complete. If you believe that there are any inaccuracies, discrepancies, or gaps in the information we hold about you, you can contact us and ask us to rectify or amend it.

In certain circumstances, you are entitled to block us from using your personal data, for example where you think that the personal data, we hold about you may be inaccurate or where you think that we no longer need to use your personal data.

Where we rely on your consent in order to process your personal data, you have the right to withdraw such consent to further use of your personal data. Please note that, if for some purposes, we need your consent in order to provide your policy. If you withdraw your consent, we may need to cancel your policy, or we may be unable to pay your claim. We will advise you of this at the point you seek to withdraw your consent.

You, also have the right to request for the erasure or destruction of your personal data. For example, where we no longer need your personal data for the original purpose, we collected it for or where you have exercised your right to withdrawn consent.

Whilst we will assess every request, there are other factors that will need to be taken into consideration. For example, we may be unable to erase your information as you have requested because we have a regulatory obligation to keep it.

In certain circumstances, you have the right to object to our processing.

## **18. Marketing**

You have control over the extent to which we market to you and you have the right to request that we stop sending you marketing messages at any time. You can do this either by clicking on the “unsubscribe” button in any email that we send to you or by contacting us at [dataprotectionofficer@convexin.com](mailto:dataprotectionofficer@convexin.com). Please note that even if you exercise this right because you do not want to receive marketing messages, we may still need to send you service-related communications where necessary.

## **19. Processing based on our legitimate purposes**

Where we process your personal data based on our legitimate purposes, you can object to our processing. We will consider your objection and determine whether or not our legitimate purposes prejudice your privacy rights.

In certain circumstances, you can request that we transfer personal data that you have provided to us to a third party.

We do not carry out any automated decision making. If this changes in the future, we will provide you with an updated notice setting out our decision-making process.

You have a right to complain to the:

Supervisory Authority	Jurisdiction	Website	Address
Privacy Commissioners Office	Bermuda	<a href="https://www.privacy.bm/">https://www.privacy.bm/</a>	Maxwell Roberts Building, 4th Floor 1 Church Street Hamilton, HM11 Bermuda

Please note that lodging a complaint will not affect any other legal rights or remedies that you have.

## 20. Cookies

By accessing and using the Convex Group website you can choose to accept Convex’s use of cookies. The website uses cookies which are small files of letters and numbers that Convex puts on your computer if you allow it. The Convex website uses Trackers to:

- Enable basic interaction and functionalities, allowing users to access selected features of the service and facilitating the user’s communication with the owner.
- Enhancement the user experience by providing a personalised user experience through improving the quality of preference management options, and by enabling interaction with external networks and platforms.
- Measure the traffic and analyse user behaviour with the goal of improving services

You can configure your web browser to refuse cookies, to delete cookies, or to be informed if a cookie is set. The “Help” section on the menu bar of most internet browsers will tell you how to do so. You may delete and block all cookies but, if you do so, our website may not function correctly, and you may not be able to access certain areas. For more information about cookies and how to delete them, visit <http://www.allaboutcookies.org>

## 21. Contacting us

If you would like further information about any of the matters in this notice or if have any other questions about how we collect, store or use your personal data, you may contact our Data Protection Officer at [dataprotectionofficer@convexin.com](mailto:dataprotectionofficer@convexin.com) or by writing to:

Shannon Dyer  
Legal Counsel  
Convex Re Limited  
6<sup>th</sup> Floor, Point House  
Hamilton  
HM11  
Bermuda

#### Updates to this privacy & cookies notice

From time to time we may need to make changes to this notice, for example, as the result of changes to law, technologies, or other developments. We will update our site with the most up-to-date notice, and we recommend that you check our website periodically to view it.

#### **Version**

This Privacy Notice was last updated on 08 April 2025.