

# Information about Data Protection for Weather & Agro Business Partners

In the present notice, we would like to explain how your personal data will be processed when you are conducting business with our Weather & Agro department, and inform you of your rights as a business partner or other interested party under Swiss data protection law.

## Who is responsible for processing your data?

New Reinsurance Company Ltd.  
Zollikerstrasse 226  
8008 Zurich  
Switzerland  
Telephone +41 (0)58 226 65 00

If you have any questions pertaining this information, please contact our Legal & Compliance department at the above mentioned address (with the addressee “Legal & Compliance”), or by sending an email to [dataprotection@newre.com](mailto:dataprotection@newre.com).

## What data and sources do we use?

We process the personal data that you provide us for the preparation or in the course of our business relationship. We may also process, to the extent necessary, any personal data that we legitimately obtain from public sources (e.g. company publications, media reports, internet). The respective personal data mainly includes your business contact information, your position, our business communication with you and the data this involves, and possibly your professional interests.

## For what purposes and on what legal grounds will your data be processed?

We process your personal data in compliance with the Swiss Federal Act on Data Protection, the Ordinance to the Federal Act on Data Protection and other applicable laws.

In particular, your personal data may be processed based on the following legal grounds:

The processing will be performed in the context of preparing, executing and terminating the business relationship, including the onboarding / KYC process, contractual arrangements and transactions in the Weather & Agro business.

We will process your personal data (primarily your business contact information) mainly to onboard your company as a new client, to contact you (including via video conference systems) and to communicate with you and/or your company.

Where necessary, we will process your data beyond the actual framework of our business relationship, for the purposes of overriding interests (i.e. legitimate interests which are not overridden by your interests or your rights and freedoms) pursued by us or a third party. Some examples of this would be:

- Transmitting data in our entity management system
- Exchanging data with our back-office MRTL (see below)

- Conducting KYC including sanctions checks for the client onboarding process
- Technical data from electronic communication and data exchange (e.g. log data)
- Processing data for maintenance/IT support purposes or for ordinary business purposes such as administration, risk management, claims handling, business analysis and accounting purposes.

Where you have consented to our processing your personal data for specific purposes, that constitutes the legal basis. You may revoke your consent at any time. Revoking consent applies only for the future and does not affect the validity of the data processed until the revocation.

We will also process your data to fulfil our legal or regulatory duties, e.g. based on supervisory provisions, retention requirements under commercial and tax laws or to compare your data against sanctions lists to comply with counter-terrorism rules (e.g. sanction lists published by the State Secretariat for Economic Affairs (SECO), the EU or US).

We have state-of-the-art technical and organisational security measures to protect your personal data against accidental or intentional manipulation, loss, destruction, and access by unauthorised parties.

Your personal data will be treated confidentially at all times. Should we wish to process your personal data for any other purpose than those mentioned, we will inform you of this in advance in accordance with the legal requirements.

## **Who receives your data? To which categories of recipient might we disclose your data?**

Only those staff within NewRe or the Munich Re Group who need your data for the aforementioned purposes will have access to it.

### Munich Re reinsurance group companies

NewRe uses and processes data in its group-wide IT systems, which is maintained and administered by Munich Re as service provider who in turn uses other sub-processors. Hence, your data may be accessible by authorised employees of certain departments within Munich Re or by other reinsurance subsidiaries of Munich Re. This includes authorised staff in our group who have access to our entity management system. Munich Re Group companies may also receive and process data for ordinary business purposes as explained above.

In addition, NewRe's Weather & Agro business is supported by Munich Re Trading LLC, Two Hughes Landing, 1790 Hughes Landing Blvd., Suite 275, The Woodlands, Texas 77380 ("MRTL") who is providing back and mid office support services in relation to weather & agro related products. To the extent necessary for providing such services, MRTL employees may process your personal data and have access to our entity management system.

### External service providers

External service providers may obtain access to your data by providing IT support or maintenance services. Corresponding data protection agreements are concluded with such service providers. The categories of service providers can be found [here](#).

### Other recipients

Further, where required or permitted by law, authorities, courts or professional advisors may also gain access to your personal data, particularly with regard to the contact / entity management system.

### **Where and how do we transfer data to countries outside Switzerland?**

We may process and transfer your data to anywhere in the world where Munich Re, its Group companies, our service providers or other recipients are located.

An overview over Munich Re's worldwide offices can be found [here](#). Service providers or other recipients may be located in Switzerland, the EU or in other countries worldwide, particularly in Asia (e.g. India) or the US. An overview of the subcontractors that are used by NewRe's service provider – Munich Re – can be found [here](#).

We only share your personal information on a basis that guarantees adequate data protection in accordance with applicable data protection laws. Should we pass on personal data to service providers or Group companies outside Switzerland, we will do so only if the Swiss Federal Council has confirmed that the respective third country's level of data protection is sufficient or if data protection is otherwise sufficiently guaranteed. The level of data protection in certain third countries (particularly the US) does not correspond to the Swiss data protection level and there is a risk that your data may be processed by authorities, possibly without the possibility of legal recourse. For data transfers into such countries, we ensure that the necessary data protection measures are implemented (e.g. binding corporate rules on data protection or standard contract clauses that have been recognised by the Federal Data Protection and Information Commissioner). In some rare cases, an appropriate level of data protection may be unnecessary if for example you have explicitly agreed to the disclosure.

The companies in the Munich Reinsurance Group have adopted binding corporate rules (BCRs). Appropriate data protection guarantees are therefore in place worldwide at these Group companies.

You can request detailed information on this, as well as on the level of data protection of our service providers in third countries, from the points of contact mentioned above.

### **How long do we store your data?**

As a rule, we anonymise or delete your personal data as soon as it is no longer necessary for the aforementioned purpose, unless statutory documentation and retention rules (e.g. under Swiss commercial or tax law) require us to keep it for longer. We will store your personal data for longer than that only in exceptional cases, where necessary in connection with claims asserted against NewRe or the Munich Re Group (which may involve a retention for an unlimited period in individual cases).

### **What privacy rights can you claim as a data subject?**

You may request information at the address indicated above about the personal data we have stored under your name. In addition, under certain conditions, you may request that your data be deleted or corrected. You may also have a right to restrict the processing of your data and a right to have the data you have made available disclosed in a standard electronic format.

If we process your data for the purpose of safeguarding legitimate (Group) interests, you may lodge an objection to such processing at the above address, provided your particular situation presents grounds for opposing such data processing. We will then stop the processing, unless we

have compelling legitimate grounds not to do so that override your interests, or if processing serves the establishment, exercise or defence of legal claims.

If you wish to complain, you can contact the Legal & Compliance department mentioned above.

### **Are you obliged to provide your data?**

We need your personal data for pursuing the business relationship with you. Without this data, NewRe cannot carry out any of these services you possibly have requested.

### **Changes to this information**

We will notify you as required of any pertinent changes to the information in this document.