Data Privacy Policy within Arundo Re

About us

Founded in 2016, Arundo Re is a reinsurance company governed by the French Insurance Code. A private limited company, its share capital of €109,106,900 is 70% owned by SMABTP and 30% by MACSF.

Arundo Re covers a wide range of Life, Non-Life and Speciality risks in nearly 90 countries, as well as Natural Disaster risks worldwide. The security of Arundo Re's overall reinsurance offering is underpinned by the stability of its underwriting policy and its teams.

Arundo Re carries out its reinsurance activity. It has two overseas branches (in Canada and Malaysia) and a representative office in Lebanon, as well as a captive reinsurance subsidiary incorporated under Luxembourg law and three subsidiaries whose main activity is real estate.

Its registered office is located at:

6 rue Favart
75002, Paris
France

Arundo Re and the protection of personal data

Arundo Re attaches great importance to the protection of the personal data of individuals (hereinafter the 'data subjects') which it processes in the course of its business. This commitment reflects the consideration it gives to any person (customers, tenants, partners, service providers) who provides it with personal data. To ensure that it provides the best information about the processing of this data, Arundo Re has drawn up this Data Privacy Policy (the 'Policy').

Who is the data controller?

Arundo Re is the data controller for the processing of personal data (hereinafter 'personal data'), for which it has defined the purposes and means, in accordance with Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the 'GDPR').

How is your data collected?

The personal data processed by Arundo Re is collected either directly from the data subjects or indirectly through its clients, partners and service providers. In its reinsurance business, Arundo Re's clients are specifically insurance and reinsurance companies ('the cedants'). Arundo Re receives premiums from these cedants in return for which it pays them a portion of their claims. In this context, Arundo Re therefore has no direct relationship (contractual, financial or otherwise) with the insureds and third-party victims, in respect of whom the cedants may provide it with certain personal data.

On what legal grounds do we process your personal data?

The legal bases for processing are set out in Article 6 of the GDPR.

Areas	Legal bases
Market reinsurance	Processing necessary for the legitimate purposes pursued by Arundo Re. Processing necessary for the performance of a legal obligation to which Arundo Re is subject. Consent of an insured person or a third party who has suffered bodily injury (to be obtained by the cedant prior to the transfer of risk in accordance with a legal or contractual obligation).
Management of job applications	Arundo Re's legitimate interest in organising the recruitment of candidates for a post.
Rental management	Processing necessary for the performance of the rental agreement. Processing necessary for the performance of a legal obligation to which Arundo Re is subject.
Arundo Re's relationships with its service providers	Processing necessary for the performance of the contract with service providers.
Extranet sites	Processing necessary for the purposes of Arundo Re's legitimate interests.
Website	Processing necessary for the purposes of Arundo Re's legitimate interests. Consent for non-essential cookies.
Filtering mechanism (LCB-FT, international sanctions)	Processing necessary for the performance a legal obligation to which Arundo Re is subject. Processing necessary for the purposes of Arundo Re's legitimate interests.

How do we process your personal data?

Your personal data is collected for specific, explicit and legitimate purposes and is not further processed in a manner incompatible with those purposes. It is also adequate, relevant and limited to what is necessary in relation to those purposes.

Access to your personal data is restricted to persons who need it to perform their duties. The processing operations involving your personal data are recorded in a data processing register in accordance with the GDPR, to which you do not have access.

What is the purpose of processing your data?

Areas	Data processed	Purposes
Market reinsurance	Personal details, identity, identification data. Professional life. Economic and financial information. Private life. Health data.	Taking out, managing and performing reinsurance treaties. Risk assessment, acceptance, control and monitoring. Payment of claims. Compilation of statistics, data analysis and actuarial studies. Research and development activities. Compliance with applicable regulations (including the setting up of regulatory provisions and other capital requirements)
Recruitment	Civil status, Identity, identification data. Professional life. Private life. Economic and financial information.	Documentation for the purposes of potential recruitment.
Rental management	Civil status, Identity, identification data. Professional life. Private life. Economic and financial information.	Entering into and performance of the lease from the date that it is entered into until its expiry. Management of the relations between Arundo Re and its tenants.
Relations with its service providers	Civil status, identity, identification details. Professional life.	Management of contacts between Arundo Re and its points of contact within its service providers, across all areas of Arundo Re's business.
Extranet sites	Personal details, identity, identification data. Professional life.	Management of online spaces dedicated to market reinsurance.
Website	Personal details, identity, identification data. Professional life.	Management of a public website on Arundo Re's governance, mission and activities.

Areas	Data processed	Purposes
Filtering mechanism (AML/CFT, International sanctions)	Civil status, identity, identification data. Professional life. Economic and financial information. Private life.	Detection of any money laundering or financing of terrorism operation. Avoid paying, via a cedant, sums to a person subject to an international sanction.

How long is your personal data retained?

Your personal data is retained for a period not exceeding that necessary for the purposes for which it is processed or for any other authorised purposes. Due to the specific nature of the insurance and reinsurance sector, Arundo Re is required to retain certain personal data relating to insured persons and third-party victims beyond the term of the reinsurance contract plus the applicable statutory limitation period.

Furthermore, Arundo Re may retain your personal data for a longer period once it has been aggregated or anonymised, as such data is then no longer governed by the GDPR.

Who are the recipients of your personal data?

In accordance with the stated purposes, the list of recipients authorised to access your personal data is strictly limited. These include the relevant departments of Arundo Re and its subsidiaries, as well as those of any service providers and subcontractors.

In addition, Arundo Re may disclose your personal data to any jurisdiction, regulatory or supervisory body, or public authority, should this be required.

Where is your personal data hosted?

Personal Data is hosted almost entirely in France, and, where necessary, in a Member State of the European Union, a country providing an adequate level of protection, or a third country subject to appropriate safeguards.

Is your personal data transferred outside the European Union?

Wherever possible, we give preference to data processors located within the European Union. However, we may transfer your data outside the European Union. These transfers are carried out in accordance with the provisions of the GDPR, and we put in place all the necessary safeguards to protect your personal data.

More particularly, in the context of its reinsurance activity, Arundo Re transfers personal data to its branch in Canada and to its representative office in Lebanon, both of which are located outside the European Union. Transfers to Canada, which is a country providing an adequate level of protection for the transfer of personal data associated with a professional activity, do not require specific and appropriate safeguards. Arundo Re (head office) entered into a data transfer agreement with its representative office in Lebanon in March 2017.

For further information on data transfers outside the EU, please contact Arundo Re's Data Protection Officer:

- by post:

Arundo Re
Data Protection
6 rue Favart - 75002 Paris

- by email:

droit.dacces@arundore.com

What are your rights regarding the data collected?

You may exercise a number of rights with Arundo Re, which will examine your request and respond within the applicable legal time frames:

1. the right of access (Article 15 of the GDPR) enables you to obtain from Arundo Re the personal data concerning you, in an accessible format, as well as any available information regarding its origin, and to question Arundo Re regarding your personal data and its processing.

2. the right to rectification (Article 16 of the GDPR) allows you to have your personal data rectified where it is inaccurate.

3. The right to erasure (the 'right to be forgotten') (Article 17 of the GDPR) allows you to have your personal data erased provided that:
– your personal data is no longer necessary for the purposes for which it was collected or processed;
– you withdraw your consent and there is no other legal basis for the processing;
– you object to the processing and there are no legitimate and compelling grounds for the processing;
– your personal data is being processed unlawfully;
– your personal data must be erased to comply with a legal obligation.

4. The right to object (Article 21 of the GDPR) allows you to object, at any time, on grounds relating to your particular situation, to the processing of your personal data when the processing is based on your consent or Arundo Re's legitimate interest, or when your personal data is processed for marketing purposes.

5. The right to restriction of processing (Article 18 of the GDPR) allows you to request that Arundo Re restrict the processing of your personal data where:
– you contest the accuracy of your personal data, for a period enabling Arundo Re to verify the accuracy of that data;
– the processing of your personal data is unlawful and you object to its erasure and instead request that its use be restricted;
– Arundo Re no longer needs your personal data for the purposes of processing, but you still need it to establish, exercise or defend your legal rights;
– you object to the processing, whilst we assess whether the legitimate interests pursued by Arundo Re override your own interests.

6. The right to data portability (Article 20 of the GDPR) entitles you to receive, in a structured, commonly used and machine-readable format, the personal data you have provided to Arundo Re, and to transmit that data to another data controller without Arundo Re being able to prevent this, where:
– the processing is based on your consent or on a contract;

– the processing is carried out by automated means.

Where technically feasible, you have the right to have your personal data transmitted directly from one data controller to another.

7. the right to determine the fate of your data after your death and to choose whether or not Arundo Re should disclose your data to a third party whom you have previously designated (Article 85 of the French Data Protection Act). In the event of your death and in the absence of any instructions from you, Arundo Re undertakes to destroy your data, unless its retention is necessary for evidential purposes or to comply with a legal obligation.

For any questions or enquiries regarding the processing of personal data by Arundo Re, you may contact Arundo Re's Data Protection Officer:

- by post:

Arundo Re
Data Protection
6 rue Favart - 75002 Paris

- by email:

droit.dacces@arundore.com

If you wish to exercise these rights, you may be asked to provide proof of your identity in order to prevent fraudulent requests.

Where applicable, you have the right to lodge a complaint with the CNIL if, after exercising your rights with Arundo Re, you consider that these rights have not been respected:

Commission Nationale de l'Informatique et des Libertés (CNIL)
3 Place de Fontenoy
TSA 80715
75334 Paris Cedex 07

Miscellaneous

This Policy is dated March 24th 2026.

It is available Arundo Re's website and a copy of this Policy may be provided by Arundo Re on request.

The information contained in this Policy is provided for information purposes only. It may be subject to amendments, corrections, updates or partial or total deletions at any time and without prior notice from Arundo Re, especially to comply with applicable regulations.