# Privacy Notice for Roosevelt Road Re Ltd. (RRRe)

Roosevelt Road Re Ltd. ("the Company"), underwrites a portfolio of niche casualty lines of business via a Class 3B license, issued by the Bermuda Monetary Authority (BMA). The Company is located at Wellesley House South, 90 Pitts Bay Road, Pembroke, Bermuda.

We are committed to upholding the privacy and confidentiality of personal information in accordance with the Personal Information Protection Act 2016 (PIPA Act). This notice outlines our practices regarding the collection, use, disclosure, and protection of personal information in relation to our services.

The terms used in this Privacy Notice are based on the requirements of the PIPA Act and recommendations of the Bermuda Office of the Privacy Commissioner ("Privacy Commissioner"). You can find out more about the Privacy Commissioner here: https://www.privacy.bm

# **Types of Data**

Categories of Information:

- Information relating to any request for assistance or support, including your name, address, contact details
- Information you supply when you directly interact with us

Sensitive or Special Category data may include:

- Information relating to any criminal or fraudulent activities provided to us by you or third parties
- Information used in fraud prevention or sanctions checking against public lists

We collect this information from the following sources:

- Information from you supplied during the course of any engagement
- From authorised third parties
- From public sources to eliminate the purpose of fraud

## Why we process your data

We process your personal data for the following purposes:

- Policy administration
- Claim processing
- Compliance with applicable laws and regulations as well as security, and compliance with corporate financial responsibilities
- When we need to contact you for the purposes of administering our service to you
- For fraud prevention, Know Your Client, and Anti Money Laundering purposes where applicable

## **Data Subject Rights**

You have a right to:

- Access your data ask the Company for copies of your personal data.
- Rectification ask that the Company corrects any information you believe is inaccurate. You may also request the Company to complete the information you believe is incomplete.
- Erasure —ask that the Company to erase your personal data, if we have no legitimate reason to continue to hold it.
- Restrict Processing ask that the Company to restrict the processing of your personal data.
- Object to Processing object to the Company's processing of your personal data under certain conditions for example withdraw consent to direct marketing.

- Data Portability ask that the Company to transfer the data that we have collected to another organization, or directly to you.
- Complaint to the Regulator. If you are not satisfied with the way we have handled a request, you
  have the right to escalate a complaint to the Privacy Commissioner of the Information
  Commissioner's Office.

## **Retention Periods**

We will not keep your personal data and information for longer than is necessary for the purpose for which it was provided unless we are required to by law or have other legitimate reasons to keep it for longer. We will typically keep information for five years after termination or cancellation of any engagement/relationship.

#### **Data Security**

We follow strict security procedures in the storage and disclosure of personal data and information employing appropriate technical, administrative, and physical safeguards to protect your personal information from unauthorized access, use, or disclosure.

#### **Contact Details:**

If you have any questions concerning the details of this notice, please contact the RRRe Data Privacy Officer via email to <a href="mailto:dpo@rrreltd.com">dpo@rrreltd.com</a>

Or write to:

Roosevelt Road Re Ltd. (Attn: Data Privacy Officer) Wellesley House South 2<sup>nd</sup> Floor, 90 Pitts Bay Road, Pembroke HM08, Bermuda

## **Changes to the Privacy Notice:**

We reserve the right to update this Privacy Notice from time to time to reflect changes to our practices or legal requirements and suggest you revisit this privacy notice periodically to keep informed as any changes will be effective once they are published.

By engaging with us or using our services, you consent to the collection, use and disclosure of your personal information as described in this notice and in accordance with the PIPA Act.