

# Privacy Statement

**Munich Reinsurance America, Inc., Munich Re America Services, Inc., American Alternative Insurance Corporation, Bridgeway Insurance Company and The Princeton Excess and Surplus Lines Insurance Company (collectively, “we,” “us” or “our”) take the privacy of our customers and the security of your information very seriously.**

We provide this Privacy Statement (“Statement”) because you have the right to know what information we collect, how it is protected and used, and the circumstances under which it may be disclosed. If you have further questions regarding this Statement, please contact us:

- by e-mail to [info@munichreamerica.com](mailto:info@munichreamerica.com) and include your name and telephone number or e-mail or postal address so that we can contact you; or
- by phone at +1 609 243-4200 ; or
- by letter to Munich Re America Services, Inc., 555 College Road East, Princeton, NJ 08543-5241, Attn: Chief Compliance Officer. Please include your name and mailing address or telephone number so that we can contact you.

## **California Consumers: How to Exercise Your Privacy Rights**

In order to exercise any of the rights described in this policy, please:

- Contact us at 844-833-2893; OR
- Click here ([munichreamericadsr.ethicspoint.com](http://munichreamericadsr.ethicspoint.com)) and completing the form.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Please press control+click to follow link. Alternatively, you can download a PDF version of the [policy here](#).

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## **To Whom This Statement Applies**

This Statement only applies to Munich Reinsurance America, Inc., Munich Re America Services, Inc., American Alternative Insurance Corporation, Bridgeway Insurance Company and The Princeton Excess and Surplus Lines Insurance Company.

Our website is operated by “Munich Reinsurance Company”. You will therefore find information on the use of cookies in the relevant data protection declaration. Please click here <https://www.munichre.com/en/general/privacy.html>.

What information do we collect and for what purposes? When you access this website, certain information (e.g. your computer's IP address, date, time) is automatically stored in our server's log files, backed up, and stored temporarily in accordance with our data recovery policies and for data security purposes (e.g. in order to identify and trace any persons gaining or attempting to gain unauthorized access to the web server). In addition to collecting the IP addresses of visitors to our Web page, we collect the e-mail addresses of those who communicate with us via e-mail, aggregate information on what pages consumers access or visit, visit-specific information on what pages visitors access or visit, information volunteered by the visitor, such as survey information and/or site registrations, name and address, telephone number, and fax number.

## **How We Use Your Personal Information**

We use your personal information to respond to and fulfill your requests for our products and services and to market our products and services, including:

- to correspond with you regarding a document or information you have specifically requested
- to send you our e-mail newsletter(s)
- to improve our website and customer service

We treat with strictest confidence any personal details sent when you access our public website. If you send us an e-mail or complete and submit the online forms on our website, your personal data (including your name and email address) will be used only for our correspondence with you in order to send you the requested documents or information, or for any other purpose stipulated on the individual form.

## **The Information We Share and Who We Share It With**

We do not rent or sell email address lists. We may share segments of your personal information with our affiliated entities as necessary to complete a transaction that you specifically request or to conduct our business operations. For example, if you request a report or publication, or if you complete and submit a feedback form as a result of your business dealings with us, we may share information about those transactions with your account manager or with our affiliates. We do this in hopes that we can continually improve our service to you.

In some instances, we share your company name (but not your name or personal contact information) with agents or contractors who assist in providing support for our internal operations.

The information we collect may be disclosed when legally required to do so, at the request of governmental authorities or regulatory agencies conducting an investigation, to verify or enforce compliance with the policies governing our website and applicable laws, or to protect against misuse or unauthorized use of our website and shared with associates in response to specific inquiries.

## **How You Can Control E-mail Communications You Receive from Us**

You have the opportunity to choose to receive e-mail communications such as our newsletters and/or notices when certain content, such as publications and reports, are added to our website. If you choose to receive such communications, you have the opportunity to un-subscribe to those communications at any time. To un-subscribe, simply click the unsubscribe link in any of the email communications you receive. Or, contact us directly by telephone, mail or e-mail at the addresses listed on this page.

## **Other Types of Information We Gather, How It Is Used and Our Use of Gifs and Cookies**

We use technology to collect anonymous, non-personal information that indicates how our site is used by visitors. We use this information to improve our site, for example by enhancing pages or features that are visited frequently, and on occasion we may share this information with our affiliates or other third party companies to help us plan for technical improvements to our website. This information will not identify you or any other user of our website as an individual.

We use clear gifs in our HTML-based e-mails to let us know which e-mails the recipients have opened.

Our website is operated by “Munich Reinsurance Company”. You will therefore find information on the use of cookies in the relevant data protection declaration. Please click here <https://www.munichre.com/en/general/privacy.html>.

## **How We Strive To Protect Personal Information**

We have implemented a variety of encryption and security technologies and procedures to protect information stored in our computer systems from unauthorized access. We also maintain procedural safeguards that restrict access to your personal information to employees (or people working on our behalf and under confidentiality agreements) who need to know your personal information in order to provide the products and services that you request.

## **Links To Other Sites**

We provide links to affiliated and non-affiliated entities and on occasion to other sites we think you may find useful. These sites operate independently and have established their own privacy and security policies. For the best online experience, we encourage you to review these policies before submitting any personal information through these sites.

## **Consent To Transfer**

Please be aware that any information you provide to us could be transferred to the United States or to the European Union. By using this website and/or providing us with your personal information through this website, you consent to this transfer.

## **For California Residents:**

This section supplements our Privacy Statement and provides specific information for residents of California (“consumers” in this section), as required under California privacy laws, and is intended to satisfy the California Consumer Privacy Act (“CCPA”), which requires that we provide certain information to California consumers about how we handle your personal information that we have collected, whether online or offline. Under the CCPA, “personal information” is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, including the categories identified in the table below to the extent they identify, relate to, describe, are reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a particular consumer or household.

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This notice provides important information to California consumers (who are not our employees, job applicants or consultants) about how we handle your personal information that we have collected, whether online or offline.

In particular, the Company has collected within the last twelve (12) months, and, in the future, will collect, the following categories of personal information about California consumers:

### Categories of Personal Information Collected

Category	Examples
Name, contact information and identifiers	Real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, telephone number, insurance policy number, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. or other similar identifiers. Some identifiers included in this category may overlap with other categories.
Records: Policyholder records, claimant records, agent records, service provider records and consumer records	Name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information or health insurance information. Some identifiers included in this category may overlap with other categories.
Protected classifications	Age, race, color, sex, age, religion, national origin, disability, citizenship status and genetic information.
Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Biometric Information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.
Internet or other similar network activity	Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with Internet websites, applications, or advertisements.
Geolocation data	Precise geographic location information about a particular device.
Audio/visual	Audio, electronic, visual, thermal, olfactory, or similar information
Educational, professional or employment-related information of policyholders, claimants, agents, or service providers	Education history, current or past job history or performance evaluations

**For purposes of this Privacy Statement, the following information is not considered to be personal information:**

- Information that is lawfully made available from government records.
- De-identified or aggregated information.
- Information excluded from the CCPA's scope, including:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

**Categories of Sources of Personal Information Collected**

We collect personal information from our commercial policyholders, claimants, other individuals with information about the risk that we are insuring or reinsuring or about a claim, service providers who provide services to us, companies that we reinsure, our agents, our policyholders’

agents, reinsurance intermediaries of the companies that we reinsure, our vendors, our third party service providers our affiliates, third party data providers and internet website visitors.

## **Business Purpose for Collecting Personal Information**

We collect personal information from our vendors and perspective vendors, including our service providers, when the vendors are negotiating and entering into a contract with us to allow us to manage our vendor procurement process, to assess and confirm a vendor's suitability for the specific product/service and to engage with vendors as needed throughout the course of business.

We collect personal information from our policyholders, claimants, other individuals, third party administrators, agents, our policyholders' agents, intermediaries, adjusters, investigators, attorneys, companies that we reinsure and other third party service providers as part of our underwriting practices to allow us to underwrite the risk, set a premium for the policy or reinsurance rate, conduct internal research and analysis, conduct our business operations, comply with legal and regulatory requirements, conduct anti-fraud processes, and, if applicable, adjust claims.

We collect personal information from agents upon entering into an agency agreement with us to allow us to manage our agent appointment process, to comply with legal and regulatory requirements and to manage our agents.

We collect personal information from individuals who access our Internet Website, application or website and from individuals who provide personal information to us in connection with consumer outreach and research and client outreach and research.

We collect information from third party data providers that is used for internal research and analysis and that is used to supplement risk attributes about our policyholders.

## **Sale of Personal Information**

We do not sell personal information. In the past 12 months, we have not sold your personal information.

## **Sharing Personal Information**

To accomplish our business purposes, we share personal information with our affiliated companies, information analytics and research vendors (for actuarial, underwriting, and product development purposes), insurance software companies, insurance agents, reinsurance intermediaries, reinsurers,

third party administrators, inspection vendors, attorneys, court reporters, arbitrators, mediators, fire and/or police departments, ladder assists, salvage, subrogation, regulatory officials and law enforcement, as required, lienholders or mortgagees, contractors engineer, temporary accommodations, risk modeling service providers, insurance rate services organizations and bureaus, repair networks, other insurance carriers, policyholders, CRM (customer relationship management) vendors, phone system vendors, social media, lienholders, reinsurers, mail service vendors, research vendors, printing vendors and other vendors and third party service providers.

We disclose the following categories of personal information for a business purpose: Name, contact information and identifiers, policyholder records, claimant records, agent records, service provider's records and consumer records, protected classifications, commercial information, biometric information, internet and other similar network activity, geolocation data, audio/visual information, education and employment information and profiles and inferences. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

## **Your Rights Pertaining to Your Personal Information**

The CCPA grants you particular rights (subject to certain exceptions) with respect to your personal information that companies may hold about you. Each of your rights is outlined in more detail below:

***Requests for Copy, Deletion and Right to Know.*** Subject to certain exceptions, California consumers have the right to make the following requests, at no charge, up to twice every 12 months:

**Copy:** The right to request a copy of the specific pieces of personal information that we have collected about you in the prior 12 months.

**Deletion:** The right to request deletion of their personal information that we have collected about you. Please note that California law provides you this right subject to certain exemptions that may apply (for example, where the information is used by us to detect security incidents, debugging, to comply with a legal obligation, or otherwise not subject to a deletion request).

**Right to Know:** You have the right to request that we tell you how we have handled your personal information in the prior 12 months, including:

- The categories of personal information we collected, sold, or disclosed for a business purpose.
- The categories of sources from which we collected personal information.

- The business or commercial purposes for collecting and selling your personal information.
- The categories of third parties to whom we sold or disclosed for a business purpose your personal information and the specific categories of personal information sold or disclosed to each category of third party.

***Authorized Agents.*** You can designate an authorized agent, pursuant to a designation that we validate, to make a request under the CCPA on your behalf.

***Incentives and Discrimination.*** The CCPA prohibits discrimination against California consumers for exercising their rights under the CCPA and imposes requirements on any financial incentives offered to California consumers related to their personal information. Businesses may offer different prices, rates, or quality of goods or services if the difference is reasonably related to the value of the consumer's data.

***For More Information.*** For questions or concerns about the business's privacy policies and practices, please contact us via the same phone number or email address listed used to exercise your rights listed below.

## **How to Exercise Your Rights**

In order to exercise any of the rights described above, please:

- Contact us at 844-833-2893; OR
- Click here ([munichreamericadsr.ethicspoint.com](http://munichreamericadsr.ethicspoint.com)) and complete the form.

We may need to request specific and/or additional information from you to help us confirm your identity and ensure your right to access or delete your personal information. This is a security measure designed to prevent the disclosure of your personal information to a person who has no right to receive it. We will only use this information to verify your identity or authority to make the request.

We will deliver our written response to you. We will not charge you a fee for access to your personal information (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, excessive, or manifestly unfounded, or we may refuse to comply with your request in these circumstances.

We will not be obligated to respond to more than two requests for data access/data portability in a 12-month period. Any responses will cover the 12-month period preceding your request.

## Updates to this Statement

We will update this privacy statement from time to time to reflect changes in our business. If we change how we use your personal information or the purposes or entities for and to which we disclose your personal information we will post the policy change in this privacy statement on our website.

Our current Statement was last updated **November 20, 2020**.