

## Country-specific features on Data privacy statement for the job application process at the Hannover Re Group through SAP SuccessFactors - Bermuda

### 1. Who is responsible for data processing and data privacy?

#### a. Data processing

Hannover Re (Bermuda) Ltd.  
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#### b. Data privacy

Hannover Re (Bermuda) Ltd.  
The Privacy Officer  
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31 Victoria Street  
Hamilton HM 10  
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Tel +1 441 705-0621  
Email [hrb@hannover-re.com](mailto:hrb@hannover-re.com)

Hannover Re (Bermuda) Ltd. recognises the right to information privacy and adheres to the Personal Information Protection Act 2016 (“PIPA”). This legislation, which follows international best practice, applies to all organisations, businesses and the government that use personal information in Bermuda. PIPA outlines how our Company will regulate and protect the use of your personal information.

### 2. Who is responsible for overseeing PIPA in Bermuda?

The Office of the Privacy Commissioner for Bermuda (PrivCom) is an independent supervisory authority established in accordance with PIPA. The mandate of the Privacy Commissioner is to regulate the use of personal information by organisations in a manner which recognises the need to protect the rights of individuals in relation to their personal information. The Privacy Commissioner has the authority to conduct investigations concerning compliance, make orders, educate the public and engage in research as well as provide guidance where needed.

#### **Contact Details:**

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### 3. What is considered Personal Information?

Personal information or data is defined as including any information about an individual. Examples include name, date of birth, photographs, email addresses and telephone numbers. 'Sensitive personal information' includes distinct information relating to an individual such as place of origin, race, health, disabilities, religious beliefs, and genetic information.

### 4. What are the conditions for the use of Personal Information?

Under PIPA, the collection and use of personal information is subject to internationally recognised principles of data privacy. Personal information may only be used if at least one of the following conditions is met:

- the organisation must be able to reasonably demonstrate that the individual has knowingly consented;
- except in relation to sensitive personal information, a reasonable person giving due weight to the sensitivity of the personal information would consider that the individual would not reasonably request that the use of his personal information should not begin or that they would want it to cease and use does not prejudice the rights of the individual;
- it is necessary for the performance of a contract to which the individual is a party or for the taking of steps at the request of the individual with a view to entering into a contract;
- use of personal information is pursuant to a provision of law that authorises or requires such use;
- the personal information is publicly available and will be used for a purpose consistent with its public availability;
- use of personal information is necessary to respond to an emergency that threatens the life, health or security of an individual or the public;
- it is necessary to perform a task carried out in the public interest or in the exercise of official authority vested in the organisation or in a third party to whom the personal information is disclosed; or
- it is necessary in the context of an individual's present, past or potential employment relationship with the organisation.

### 5. What are the statutory obligations on organisations under PIPA?

PIPA imposes the following statutory obligations on organisations that use personal information:

- the organisation must designate a representative as a privacy officer for compliance purposes;
- the organisation must provide individuals with a clear and easily accessible privacy notice detailing its practices and policies with respect to personal information either before or at the time of

collection of the information (unless all use of the information is within the reasonable expectations of the individual to whom the personal information relates);

- with certain exceptions, the personal information can only be used for the limited purposes set out in the privacy notice;
- the information collected must be adequate, relevant and not excessive in relation to the purpose it is used;
- the information must be accurate and kept up to date to the extent necessary for the purpose of use and cannot be kept longer than necessary for that use;
- the personal information an organisation holds must be protected with adequate safeguards against loss, unauthorised access and other misuse. Safeguards must be proportional to the likelihood and severity of the harm threatened by the loss, the sensitivity of the personal information and the context in which it is held;
- in case of breach, the organisation must notify the Privacy Commissioner without delay and all individuals that may be affected; and
- where an organisation engages the services of a third party in connection with the use of personal information, the organisation remains responsible for ensuring compliance.

## 6. Who receives your personal information?

As a global organisation, please note that all information provided will be kept strictly confidential and processed in accordance with local regulations and principles. Please be advised that your personal information will be shared within the Hannover Re Group (Hannover Rück SE and E+S Rückversicherung AG – hereinafter Hannover Re) in Hannover and the rights to which you are entitled under data privacy law.

Hannover Re, with its registered office in Hannover, operates the human capital management system "SAP SuccessFactors Recruiting" worldwide to manage job applications and publish vacant positions for its headquarters in Germany and for its Group companies worldwide. The human capital management system is used in particular as support for personnel recruitment, i.e. to fill vacant positions within the Hannover Re Group – both in Germany and around the world – with suitable candidates. Our platform for online applications is operated by the external service provider SAP, which in turn makes use of other IT service providers.

## 7. How long will your personal information be stored?

Your personal information will be automatically deleted six months after the conclusion of an online application process. This does not apply if legal provisions prevent erasure or further storage is necessary for evidentiary purposes or if you have consented to longer storage.

If you do not delete your personal account in the Hannover Re application portal, your personal information will remain stored in your application profile for six months from the last status update. This means that you can use it for further applications to Hannover Re. If you neither change your data nor apply for another position within six months and your application status is not active, your application profile will be automatically deleted after this period. In this case, only anonymised data will remain on the portal.

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