



## **Website Privacy Notice and Cookie Policy**

*For External Use*

## 1. Introduction

Warwick Re Limited and its affiliates (**Warwick, we, us, or our**) is committed to protecting your privacy and to processing your personal information in a lawful and fair manner.

Under data protection legislation, Warwick is a **controller** of your personal information because it determines the purposes for which and the manner in which personal information is collected, used, or disclosed in the course of conducting its business.

This privacy notice explains how we look after your personal data and how the law protects you – specifically the UK General Data Protection Act 2018 (**GDPR**), the UK Data Protection Act 2018 (**DPA**), the Japanese Act on the Protection of Personal Information 2022 Amendment (**APPO**), the Bermudian Personal Information Protection Act 2016 (**PIPA**), and the California Consumer Privacy Act (**CCPA**).

It is important to read this notice if you are a policyholder or member of a pension scheme that is reinsured by Warwick, or if you visit our website.

## 2. Your data protection rights

Under data protection legislation, you **always** have the:

- **Right to be informed** whether we hold and are processing personal information about them;
- **Right of access** to the personal information we hold about you in an understandable form setting out the purposes for which it is being held and processed, and the recipients or classes of recipient to whom the personal information is, or may be, disclosed by us.
- **Right to rectify** the personal information we hold about you if it is inaccurate or incomplete.
- **Right to complain** to the relevant supervisory authority if you believe we have mishandled your data. Contact details for the relevant supervisory authorities have been provided in section 1.2 below.

Under **certain circumstances**, you also have the:

- **Right to withdraw** your consent to process your personal information where we rely on your consent to process your personal information, for instance, to opt out of marketing emails.
- **Right to erasure** of your personal information on certain grounds, for example, where the personal information is no longer necessary to fulfil the purposes for which it was collected.
- **Right to restrict processing** of your personal information on certain grounds, for example, if it is incorrect, or it is no longer needed for its original purpose.
- **Right to transfer** your personal information to another controller in a structured, commonly used and machine-readable format.
- **Right to object** to our processing of your personal information, for example, you can object to transfer of your personal information to third parties and to automated decision making.

## 2.1. Exercising your rights

If you wish to exercise any of your data protection rights, please contact our Data Protection Officer using the details provided below, who can guide you through the process.

You should not have to pay a fee to access your personal data or to exercise any of your associated rights. However, we reserve the right to charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive.

We must confirm your identity to verify your right to access your personal data (or to exercise any of your associated rights). This is a security measure to ensure that personal data is not disclosed to anyone who is not entitled to receive it. If your request is made through an authorised agent (as defined under CCPA) we may require additional information to protect your personal information.

We may also contact you to request further information in relation to your request, to help us respond more efficiently.

We aim to respond to all legitimate requests within one month. Occasionally, it may take us longer if your request is particularly complex or if you have made multiple requests. In such cases, we will notify you and keep you informed of our progress.

## 2.2. How to complain

We want you to be satisfied with how we handle your personal data. If you have any concerns, we would appreciate the opportunity to address them directly in the first instance. The contact details for our Data Protection Officer (**DPO**), Radha Muthuswamy, are provided below.

However, you also have the right to lodge a complaint with the data protection supervisory authority in your country of habitual residence, place of work, or where you believe a breach of data protection law has occurred.

For UK policyholders, the local supervisory authority is the Information Commissioner's Office (**ICO**). The ICO can be contacted on +44 (303) 123 1113 or via their website at <https://ico.org.uk/concerns>.

For Japanese policyholders, the local supervisory authority is the Personal Information Protection Commission (**PPC**). The PPC can be contacted on +81-3-6457-9680 or via their website at <https://www.ppc.go.jp>.

All policyholders can contact the Bermuda's Privacy Commissioner via their website at <https://www.privacy.bm>.

### 3. Contact us

If you have questions, concerns, or requests related to your personal information, please contact our Data Protection Officer:

Name	Radha Muthuswamy
Address	Warwick Re Limited, Cedar House, 41 Cedar Avenue, Hamilton HM12
Email	<a href="mailto:info@warwickre.com">info@warwickre.com</a>

We will respond to your inquiries and requests within a reasonable timeframe, in accordance with applicable data protection laws.

### 4. Third party links

Our website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

## 5. Personal information we process

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed, as this is known as anonymous data, which is outside the scope of data protection laws.

We collect personal information for the purposes of providing reinsurance services, managing risks, complying with legal obligations, and maintaining business operations.

The types of personal information we collect may include:

- **Identification data** (e.g., name, date of birth, identification numbers).
- **Contact details** (e.g., address, email, phone number).
- **Technical data** including internet protocol (**IP**) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profiling data** including your username and password, your interests, preferences, feedback, and survey responses.
- **Usage data** including information about how you use our website, products and services.
- **Marketing and communications data** including your preferences in receiving marketing from us and our third parties and your communication preferences.

Some of this information is confidential personal data, which we will ensure is appropriately protected:

- **Health and medical information** related to the underwriting and claims process.
- **Financial information** related to premiums or benefit payments.
- **Transaction data**, including details about payments to and from you and other details of services you have purchased from us.

We also collect, use, and share aggregated data, such as statistical or demographic data, for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

## 6. Where we obtain your information

We use different methods to collect information from and about you.

**Direct interactions** may provide us with your identity, contact, and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: apply for our services, create an account on our website, subscribe to our service or newsletters, request marketing to be sent to you, enter a competition, promotion, or survey.

**Automated technologies** may collect technical data about your equipment and navigation of our website. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

**Third parties or publicly available sources**, such as public registers, networking sites, or your corporate website, could provide your personal information. For example, search engines such as Google based outside the EU or public registers such as Companies House and LinkedIn.

## 7. Why we process your information

We collect and use personal information solely for lawful and legitimate purposes in the course of our business activities. These purposes include:

- **Administering reinsurance agreements:** managing contractual terms, maintaining records, and facilitating communication with counterparties.
- **Assessing risks and processing claims:** evaluating underwriting risks, verifying data, and handling claims in line with policies.
- **Meeting legal and regulatory requirements:** complying with laws and regulations, including anti-money laundering, tax reporting, and data protection obligations. This may involve disclosures to regulators or law enforcement.
- **Conducting audits and investigations:** using data for internal and external audits, inquiries into misconduct, and broader business operations such as reporting and quality assurance.
- **Establishing or defending legal claims:** using data to initiate or respond to legal proceedings or enforce contractual rights.
- **Responding to enquiries:** managing communications from policyholders, partners, regulators, and the public.
- **Managing our website:** maintaining functionality, enhancing security, and improving user experience through analytics and system monitoring.

We take the protection of your personal information seriously and implement appropriate safeguards to ensure its confidentiality, integrity, and availability.

## 8. Sharing your information

We share personal data with a variety of third parties to operate our business and to provide insurance and reinsurance. Personal information may be shared with:

- **Our affiliates, subsidiaries, and business partners** for operational purposes;
- **Tracing agencies**, mortality screening companies and financial sanctions screening companies;
- **Third party administrators**, the scheme actuary and the actuarial team;
- **Reinsurers** with whom we reinsure some of the risks to which we are exposed;
- **Professional advisers** including accountants, lawyers and actuaries;
- **Regulators and law enforcement agencies** as required by law;
- **IT service providers** who process data on our behalf under strict confidentiality agreements;
- **Other service providers and contractors** who process data on our behalf under strict confidentiality agreements; and
- **Other entities** as required to protect our legal interests or comply with legal obligations.

## 9. International transfers

We may transfer your personal data to jurisdictions that may not provide the same level of data protection as your home jurisdiction.

Where such transfers occur, we ensure that they are carried out in compliance with applicable data protection laws and, only where appropriate safeguards are in place. These safeguards may include standard contractual clauses approved by the relevant regulatory authorities or under applicable law.

We take all necessary steps to ensure that your personal data remains protected if and when transferred internationally.

## 10. Storing and securing your information

### 10.1. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When determining an appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## 10.2. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, accessed in an unauthorised way, altered, or disclosed.

Further, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 11. Cookies and other technologies

Cookies are small text files stored on your device when you access most websites on the internet or open certain emails. Among other things, cookies allow a website to recognise your device and remember if you have been to the website before. We use the term cookie to refer to cookies and technologies that perform a similar function to cookies (e.g. tags, pixels, and web beacons).

### 11.1. Cookie types

**Necessary cookies** – these cookies are necessary for the operation of our website. They don't access or store any personal data. Our website cannot function without these cookies so they are, by default switched on.

**Analytics cookies** – these cookies analyse website usage such as which pages are most popular and how visitors move around the site. The information collected does not directly identify any individuals.

#### 11.1.1. Necessary cookies

Cookie	Description	Duration
__cf_bm	This cookie, set by Cloudflare, is used to support Cloudflare Bot Management.	1 hour
cf_clearance	Cloudflare sets the cookie to manage and verify CAPTCHA challenges, ensuring that legitimate users can access the website while blocking malicious traffic.	1 year
elementor	This cookie is used by the website's WordPress theme. It allows the website owner to implement or change the website's content in real-time.	Never
wpEmojiSettingsSupports	WordPress sets this cookie when a user interacts with emojis on a WordPress site. It helps determine if the user's browser can display emojis properly.	Session



### 11.1.2. Analytics cookies

Warwick does not currently use analytics cookies on its website.

## 11.2. Cookie management

### 11.2.1. Website control

When you access our website, you will receive a notification informing you that our website uses cookies along with an option of whether to browse using cookies along with a link to our Privacy Policy.

You have the ability to accept or decline cookies. By default, all cookies, except necessary cookies, are disabled. By accepting the cookies, you consent to the processing of data about them by Warwick Group for the purposes set out above.

You can choose not to use cookies by not accepting the option and still access our website without enabling the cookies. However, in a few cases, some of our website features may not function as a result.

### 11.2.2. Browser control

You also have the ability to accept or decline cookies through their internet browser software and can modify these settings to accept, decline and remove cookies if they prefer. Your choices will include the ability to switch off cookies completely and removing cookies by deleting them when you leave our site. If you do switch cookies off you may find problems with the operation of our website.

Instructions on how to do so, for some of the most common browsers, are detailed below.

[Google Chrome](#)

[Firefox](#)

[Safari\(Mac\)](#)

[Safari\(iPhone/iPad\)](#)

[Internet Explorer](#)

[Microsoft Edge](#)

## 12. Changes to this notice

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Where we make changes to our privacy notice we shall let you know. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

This version was last updated in July 2025.