

Privacy Notice for participants of Gen Re Business School's further education and training program

This notice is designed to provide you with information about the processing of your personal data by General Reinsurance AG and about your rights according to data protection law.

Data controller – Who are we?

General Reinsurance AG
Theodor-Heuss-Ring 11,
50668 Köln, Deutschland
Tel.: +49 221 9738 0
Fax: +49 221 9738 494
E-Mail: AskGenRe@genre.com

You can contact our Data Protection Officer at this address by marking your correspondence for the attention of the Data Protection Officer or by emailing to: DPO_EU@genre.com.

For what purposes and on what legal basis do we process your data?

We process your personal data while complying with the EU General Data Protection Regulation (GDPR), the Federal Data Protection Act (Bundesdatenschutzgesetz BDSG) and all other relevant laws.

Gen Re Business School processes personal data (such as first name, surname, employer, address, e-mail, telephone number, date of birth if applicable, and level of subject knowledge) in order to carry out its further education and training programmes (correspondence, participant administration and process organisation).

In addition, we process your data in order to be able to confirm the achievement of further education and training (e.g. the marks attained) and to be able to create replacement documents in the event of a possible loss of certificates, diplomas and/or certificates of participation. This refers to information relating to your participation in Gen Re Business School's further education and training programs (e.g. The name of the event / course / module(s) you have participated in, as well as examination results, dates, employer and contact details).

All user activities within our online learning platform will be recorded. The number of available learning objects / documents, access statistics of documents ("clicks") and the access speed (benchmark test) will be analysed in a fully anonymised way.

We process your personal data on the basis of Article 6 paragraph 1 f) DSGVO in order to be able to offer you and your company the aforementioned service with reference to the requirements described above.

In addition, we process your personal data to fulfill legal obligations such as commercial and tax document retention obligations. The legal basis for the processing in these cases are the respective legal regulations in conjunction with Art. 6 Para. 1 c) DSGVO.

For other purposes not mentioned here we use solely anonymised data. Should we wish to process your personal data for a purpose not stated above, we will inform you beforehand within the framework of the statutory provisions.

Categories of recipients of personal data

► Data processing within the Gen Re group of companies

Your personal data is in part also processed by associated companies of General Reinsurance AG. This happens as part of:

- general IT services provided by the General Reinsurance Corporation for its subsidiary General Reinsurance AG

► External service providers

We use external service providers in order to meet some of our contractual and statutory obligations:

- IT service providers for maintenance, operation and backup of systems and applications, data restoring and data destruction;
- Service providers for data management (storing and termination of documents);
- Service providers for copy and print;
- Audit service provider for carrying out internal audits and IT security audits;
- IT service providers for additional services as part of clients events, such as polling services;

► Additional recipients

Furthermore it might be necessary to share your data with public authorities in order to fulfil reporting obligations:

- Supervisory authorities
- Chartered accountants
- Prosecution authorities
- Social insurance agencies
- Hotels, Private International Travel Health Insurance Fund, Chamber of Industry and Commerce, Chartered Insurance Institute

What rights do you have in respect of your personal data?

► Right to access, rectification, erasure, restriction of processing and portability

You can initiate an access request under the above mentioned contact details to obtain information on the personal data we hold and process about you. Furthermore, in certain circumstances you have the right to have your personal data rectified, erased or processed restrictively. In addition, you have the right to data portability, i.e. to receive the personal data you have provided to us in a structured, commonly used and machine readable format, and to have that personal data transmitted directly to another data controller.

► Right to object to the processing

You have the right to object to processing of your personal data for direct marketing purposes. If we process your data in order to safeguard legitimate interests you have the right to object to such processing if reasons that argue against the processing result from your particular situation.

► Right to lodge a complaint

You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement.¹ The following data protection agency has responsibility for us:

¹ Contact details of all European Data Protection Authorities can be found on the European Commissions official website at http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm

Landesbeauftragte für Datenschutz und Informationsfreiheit Nordrhein-Westfalen
(Data Protection and Freedom-of-Information Officer for the State of North Rhine-Westphalia)
Postfach 20 04 44
40102 Düsseldorf
Tel.: 0211/38424-0
Fax: 0211/38424-10
E-mail: poststelle@ldi.nrw.de
Internet: www.ldi.nrw.de

► Right to withdraw your consent

If we process your personal data on the basis of your consent, you have the right to withdraw this consent at any time. The withdrawal of your consent might impact the further processing of your personal data in regard to the purpose. More details on the consequences of a consent withdrawal are included in the information provided to you with the consent form.

Transfer of your personal data to a third country

Should we transfer personal data about you outside of the European Economic Area (EEA), this transfer only takes place, if guarantees (e.g. an adequacy decision of the European Commission, Binding Corporate Rules, European Standard Contractual Clauses or other approved contracts) are in place that ensure an adequate level of protection. Detailed information on this and on the data protection level of recipients in third countries can be requested from the above-mentioned contacts.

Retention and deletion of your personal data

We will retain your personal data for as long as is necessary for the purpose(s) set out above, or for as long as is required by law.

Personal data that is processed for the purpose of carrying out the training courses will be stored for up to five years after completion of the training course.

Personal data collected in the course of determining the success of individual further training (e.g. results achieved, online user activities) will also be stored for ten years after completion.

We store personal data collected for the purpose of producing certificates of participation and the success of further training until the documentation and verification function of these certificates is no longer relevant to the participant and the request for a possible newly issued certificate to be sent is no longer to be expected. This point in time is reached at the presumed retirement age of 67 and thus varies depending on the age of the participants in the Gen Re Business Schools further education and training programmes.

We also store your personal data as we are legally obliged to do so. Corresponding documentation and storage obligations arise, among other things, from the German Commercial Code, the Tax Code and the Money Laundering Act (storage periods of up to ten years are legally required).