

Privacy Notice

This Privacy Notice summarizes the policies of Herald Reinsurance U.S. Holdings Company and Herald Reinsurance Limited (collectively, “Herald Re”, or “we”) with respect to Personal Information of users of the Herald Re website, <https://www.heraldre.com> (the “Site”).

This Privacy Notice describes the kinds of Personal Information we collect and how that Personal Information is used. Please read the following carefully to understand our views and practices regarding Personal Information and how we will treat it.

Personal Information Collected

When you visit the Site, our web server automatically collects standard log information which in some cases refers to a particular individual or user (“Personal Information”). This information may include your Internet Protocol (IP) address, browser type, the pages you visit, the date and time of your visit, and the website that referred you to the Site. We generally do not collect other Personal Information you provide directly via the Site (such as your name or email) because we do not have user registration forms or other interactive features on the Site.

Purposes for Processing Personal Information

We use the collected Personal Information for the following purposes:

- **Website Security and Maintenance:** We use IP addresses and other log data to monitor for and prevent security threats, abuse, or other malicious activity.
- **Troubleshooting:** Log data helps us diagnose problems with our server and analyze website performance.
- **Analytics and Statistics:** We analyze log data in an aggregated, anonymous format to understand traffic patterns and improve our website. For example, we may track which pages are most popular.

In addition, we may process Personal Information in any of the categories for the following further reasons: (i) to exercise and comply with rights and obligations at law or under regulation, or under contract, including for the establishment, exercise or defense of legal claims by or against it; (ii) to manage and administer our business and the Site; (iii) to help detect, prevent, investigate, and prosecute fraud and/or other criminal activity; (iv) to manage our information technology systems and to ensure the security of our systems; (v) to disclose information to a governmental, tax or regulatory body, financial market, broker or other intermediary, counterparty, court, auditors or other third parties and to conduct compliance activities when we think this is in our, or someone else’s legitimate interests; and (vi) to investigate and respond to any complaints or any incidents relating to us.

Lawful Basis for Processing Personal Information

We process Personal Information because it is necessary to do so for our legitimate business interest in operating the Site and our business, or because we are required by applicable law to do so.

Disclosure of Personal Information

We do not disclose Personal Information to third parties, except:

- as reasonably necessary or appropriate in connection with the business and operations of Herald Re;
- to processors who are only permitted to use it to perform services for us;
- as required and/or permitted by law, any applicable regulatory authority; or
- to protect our rights, property, or safety or those of our clients and investors or others.

In these cases, we may share Personal Information with legal advisers, accountants, consultants, senior advisors, banks, administrators, custodians, brokers, financing sources and similar counterparties, regulators, government agencies, external service providers, companies engaged to dispose of or store data including Personal Information, and adverse parties who have a legal right to receive such information and their counsel, experts and legal advisers.

We will take reasonably necessary steps, where possible, to ensure that where Personal Information is shared, it is treated securely and in accordance with this Privacy Notice and applicable laws.

Personal Information Retention

We aim not to keep Personal Information in a form that allows an individual to be identified for any longer than is reasonably necessary for achieving the permitted purposes described above. At the end of the applicable retention period, we may destroy, erase from our systems, or anonymize Personal Information as part of such efforts, to the extent permitted by applicable law or regulation.

Storage & Transfer of Personal Information

We maintain physical, electronic and procedural safeguards designed to protect individual's Personal Information, prevent unlawful or unauthorized processing of Personal Information, and prevent unauthorized disclosure of, or accidental loss of, or damage to, such Personal Information.

We may process Personal Information in, and transfer Personal Information to, countries that may not guarantee the same level of protection for Personal Information as the country in which data subjects reside. Where we transfer Personal Information which is subject to the Cayman Islands Data Protection Act to recipients who are located outside the Cayman Islands, we will,

wherever possible, take appropriate steps that are within our control to take to ensure that adequate legal safeguards are in place for Personal Information which are shared with such recipients (for example, by obtaining contractual assurances from the recipients).

We will generally only transfer Personal Information to third party service providers if they agree to comply with the physical, electronic and procedural safeguards described above, or if they put in place adequate measures themselves.

Rights in relation to Personal Information under the Cayman Islands DPA

Where applicable under the Cayman Islands DPA, data subjects have certain rights in relation to their Personal Information, including the right to be informed about the collection and use of their Personal Information, as outlined in this Privacy Notice.

These include, where certain conditions are met:

- the right to request access to the Personal Information we hold about them;
- the right to have inaccurate information about them amended or updated;
- the right to object to the processing of Personal Information about them;
- the right to withdraw consent at any time (where relevant);
- the right to have Personal Information about them erased or to restrict processing in certain limited situations;
- the right to data portability and to request the transmission of Personal Information about them to another organization;
- the right to object to automated decision making that materially impacts them, direct marketing, and processing for research or statistical purposes; and
- the right to lodge complaints with applicable data supervisory authorities.

Changes to this Privacy Notice

We reserve the right to modify this Privacy Notice at any time and without prior notice.

Questions

If you have any questions in relation to this Privacy Notice, please contact Herald Reinsurance U.S. Holdings Company, c/o Everlake, 3100 Sanders Road, Suite 303, Northbrook, IL 60062.