

# PRIVACY NOTICE

SCOR BRASIL RESSEGUROS S.A.  
SCOR REINSURANCE ESCRITÓRIO DE REPRESENTAÇÃO BRASIL LTDA  
SCOR SE ESCRITÓRIO DE REPRESENTAÇÃO NO BRASIL LTDA  
SCOR BRASIL PARTICIPAÇÕES LTDA

## Our commitment to Privacy and Data Protection

SCOR BRASIL RESSEGUROS S.A., SCOR REINSURANCE ESCRITÓRIO DE REPRESENTAÇÃO NO BRASIL LTDA and SCOR SE ESCRITÓRIO DE REPRESENTAÇÃO NO BRASIL LTDA and SCOR BRASIL PARTICIPAÇÕES LTDA (together "SCOR BR") respect your privacy and are committed to protecting your Personal Data. SCOR handles your Personal Data in an appropriate and transparent manner.

SCOR BR undertakes to comply with the principles of data protection in the processing of Personal Data relating to its Clients, Insured Persons, Beneficiaries, Employees, Business Partners and other persons with whom it has a relationship, and to respect their fundamental and privacy rights in accordance with the applicable laws in force.

This Privacy Notice is part of the Scor SE Privacy Notice and provides additional information on the processing of Personal Data by SCOR BR in accordance with the General Data Protection Law.

## Who are we?

SCOR BR, part of SCOR SE - a French company based in Paris, operates in the reinsurance market in Brazil. Our head office is located in the City of Rio de Janeiro, State of Rio de Janeiro, at Rua Visconde de Inhaúma, n.º 83, Sala 1501, Centro, CEP: 20091-007.

## What do we do?

SCOR BR is involved in receiving part or all of the risks assumed by insurers in their policies in exchange for a premium. Reinsurance allows insurers to better manage their risks and increase their underwriting capacity, offering greater stability to the insurance market.

SCOR BR is a reinsurer. In most cases, our clients are insurance companies, also known as insurers. Insurers provide insurance cover to individuals and companies, who are called insureds.

Normally, insurance companies and insureds enter into contracts called policies. Insurance policies can protect the insured against a wide variety of losses, including loss of life, loss of or damage to property, loss associated with health issues or problems and loss arising from third-party liabilities.

A reinsurer provides insurance cover to insurers in the same way that insurers provide insurance cover to insureds. Reinsurers and insurers enter into Reinsurance Agreements. These Reinsurance Agreements provide coverage to insurers against losses, usually related to one or more policies between the insurer and its insured(s). Reinsurers receive premiums from insurers and pay claims to them or directly to insureds or beneficiaries, as the case may be.

Reinsurers, such as SCOR BR, can also have their own reinsurers (called retrocessionaires) who provide insurance cover to the reinsurer. In this way, reinsurance serves to distribute the risk of loss between two or more companies, which helps to ensure that reserves will be available to pay claims, especially when a significant loss event occurs.

SCOR BRASIL PARTICIPAÇÃO Ltda., the direct parent company of ESSOR and SCOR BRASIL Resseguros, which, given its corporate nature, processes employees' Personal Data.

### Which privacy laws do we comply with?

We comply with the General Data Protection Law ("LGPD"), as well as the regulations issued by the National Data Protection Agency ("ANPD"). The LGPD and the ANPD establish the requirements for organizations to process personal data.

### Why do we process your personal data?

When an insurer issues an insurance policy to an insured, the insurer needs to know certain information about the insured. Normally, the insurer collects this information from the insured during the policy underwriting process. This information is needed to assess the risk presented by the insured.

When SCOR BR, as a reinsurer, enters into a Reinsurance Agreement with an insurer to provide reinsurance cover, this cover is usually linked to a policy, or group of policies, that the insurer has underwritten with its insured(s). Just like an insurer, the reinsurer needs to know certain information about the insured(s). For this reason, the insurer transmits certain data about the policy(ies) and the associated insured(s) to the reinsurer. Some of this data is Personal Data.

Similarly, SCOR BR may also transmit some Personal Data to its retrocessionaires.

In connection with its reinsurance activities, SCOR BR will engage in a variety of information exchanges, including but not limited to letters, emails, reports and other similar activities that may necessarily include Personal Data relating to the insured(s) or Personal Data relating to the business of employees of insurers, reinsurers, retrocessionaires, other Clients, Third Parties or Business Partners.

In addition, SCOR has employees, contractors, apprentices and trainees and other similar types of workers (together referred to as "Collaborators"). In the course of its professional relationship with its Collaborators, SCOR BR will have access to Personal Data relating to these Collaborators. SCOR BR also receives information from job applicants, such as CVs, letters of interest and other similar documents, and therefore SCOR BR also holds Personal Data about these applicants.

### Why do we process your personal data?

When an insurer issues an insurance policy to a insured, the insurer needs to know certain information about the insured. Normally, the insurer collects this information from the insured during the policy underwriting process. This information is needed to assess the risk presented by the insured.

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## Legal basis for processing personal data

As described above, acting as a reinsurer, SCOR BR may process Personal Data, in furtherance of its legitimate business interests, as a data controller and party to reinsurance contracts with insurers / insurance policies with insureds. This interest is the fulfillment of SCOR BR's contractual obligations with the insurer which, in turn, has its own contractual obligations with the insured, including regulation and payment of individual claims. The processing of such Personal Data by SCOR as a reinsurer is therefore in the interests of both the insurer and the insured.

Also in its commercial interests, SCOR BR may process the personal data of employees of its business partners for the purpose of fulfilling contractual obligations.

In addition, as an employer, SCOR BR is required by law to process certain Personal Data for the purposes of recruiting and selecting people, hiring employees, registering benefits, making salary payments, registering beneficiaries in life insurance and private pension plans, registering dependents for income tax purposes, as well as complying with all applicable laws and regulations relating to labor issues. This data processing is therefore for the fulfillment of SCOR BR's contractual obligations with candidates and employees, as well as for the fulfillment of legal and regulatory obligations before the Ministry of Labor and Employment.

## Personal data we process

Insurers may provide us with personal information, which sometimes includes confidential, financial, sensitive information, data protected by legal, judicial or professional secrecy, data on children, adolescents or the elderly.

We collect personal information, including confidential and sensitive information, so that we can evaluate insurance applications or claims sent to us by insurers. The purpose of collecting this information is to enable us to support the insurers who provide services to you.

The personal data provided by insurers to SCOR BR may include:

- identifying information such as name, address, profession, gender, date of birth,
- information regarding health status and other medical information,
- information relating to the death, injury or loss of a person who may be covered by a Policy,
- information relating to certain personal characteristics or habits, such as whether a person smokes cigarettes or engages in hobbies or activities that present special risks for the insurance,
- other information that may be necessary to assess any aspect of premiums, claims or coverage under a policy.

This data is normally provided to SCOR BR under the terms of the contracts concluded between SCOR BR and the Insurers. Similarly, SCOR may provide the same type of personal data to its retrocessionaires, again under the terms of the contractual agreements entered into between them. When these retrocessionaires are located outside Brazil, SCOR BR has appropriate data transfer agreements or clauses. In addition, SCOR BR also maintains a Data Transfer Agreement covering transfers of Personal Data to SCOR Group companies. SCOR BR has adopted technical and organizational measures to provide a satisfactory level of protection for data transferred internationally. You can request, through the Data Controller, that SCOR BR inform you if your Personal Data has been sent to one or more of our retrocessionaires. Consent, where required, is generally obtained by the insurer when you apply for an insurance policy or make a claim for compensation.

The Personal Data provided to SCOR BR within the scope of the employment contract or recruitment and selection process may include information including, but not limited to:

- name, address, telephone number, e-mail address, gender, date of birth, CPF, ID, professional registration, professional and educational history,
- information on dependents,
- medical and health information.
- The Personal Data provided to SCOR BR within the scope of contracts for the supply of goods or services signed with Business Partners may include information including, but not limited to:
  - name, CPF, ID and e-mail address of legal representatives or proxies,
  - name and e-mail address of employees.

In any case, your Personal Data is processed by SCOR BR as permitted by the General Data Protection Law and the regulations of the National Data Protection Agency.

## Use and disclosure of your personal information

- We only use and disclose your Personal Data for the purpose for which it was collected, unless the use or disclosure for another purpose has your consent or is permitted by law.

- In general, we use your personal information to assess the risk associated with an insurance policy or claim in order to determine whether to provide reinsurance services.
- We may disclose your personal information to:
- Our related corporate entities for the purpose of carrying out our corporate functions or reporting. These related entities may be located abroad, in any of the countries in which the SCOR Group operates, including but not limited to Singapore, Germany, France and Ireland.
- Service providers and third parties for activities on our behalf or to provide us with services, such as agency services.
- External auditors.
- Co-insurers and retrocessionaires who help us provide reinsurance services.

## Protecting your personal information

We keep your Personal Data in databases and physical files. We take all reasonable steps to securely retain all the information we hold. This includes the use of passwords and other security measures. We also maintain security procedures to manage and protect the use and storage of paper records containing personal information. We regularly review our systems to ensure that they are effective in keeping your personal information secure.

## Our processing of personal data

### Purposes

- **Managing relationships with insurers** - SCOR BR collects Personal Data in order to identify its professional contacts with employees of insurers and business partners with whom it has relationships. For this process, SCOR BR collects only the professional data necessary to identify and contact Insurers and Business Partners in order to manage their business.
- **Provision of reinsurance** - SCOR BR processes Personal Data for the purpose of identifying, assessing, underwriting and making payments on claims relating to insureds or beneficiaries. SCOR BR does not carry out automated decision-making activities. Although SCOR BR does not engage in profiling as part of its business, underwriting can be considered a form of profiling. In this sense, underwriting means that SCOR BR can analyze Personal Data relating to a person - such as age, height, weight, occupation, gender, medical history, hobbies or recreational activities, personal habits that affect health, such as smoking cigarettes - in order to determine the risk of mortality or morbidity (risk of disease or health problems). When SCOR BR is acting as a reinsurer, the results of this underwriting can be passed on to the Insurer who, in turn, can use the information to decide whether to issue life or health insurance and at what price.
- **Obtaining reinsurance cover** - As described above, SCOR BR may acquire its own reinsurance cover from retrocessionaires. In this regard, SCOR BR may provide information to its Retrocessionaires that is similar to the information provided to SCOR BR by the Insurers, as described above.

- **Screening and review** - SCOR BR regularly examines certain aspects of Personal Data, such as names, dates of birth, addresses and countries of residence in relation to lists provided by governments or organizations relating to sanctions, embargoes, money laundering, politically exposed persons and other similar matters. SCOR BR may also carry out a review and assessment of transactions or proposed transactions to determine whether there is or may be money laundering or terrorist activity. This process helps SCOR BR ensure that it does not engage in any business transaction, or permit any business transaction, with respect to any sanctioned natural or legal person.
- **Know Your Client, Employee, Beneficiary and Your Business Partner** - SCOR BR is regulated by the Brazilian reinsurance market regulator, the National Insurance Council ("CNSP") and supervised by the Superintendence of Private Insurance ("Susep"). SCOR BR collects Personal Data to carry out due diligence and perform checks to comply with the regulatory requirements of Know Your Customer, Employee, Beneficiaries and other related parties.
- **Human Resources** - SCOR BR collects and processes Personal Data to establish an application for a specific job advertisement or as an unsolicited application, in particular for the following purposes: verification and assessment of suitability for the position to be filled, performance and behavioral assessments to the extent permitted by applicable law, if necessary for registration and authentication for application through the SCOR website, if necessary for the preparation of any employment contract.
- **Investigating internal or external complaints** - SCOR BR may collect and process Personal Data for the investigation of complaints related to violations of our code of conduct or violations of laws, including issues related to bribery and corruption, fraud, financial crime, harassment and discrimination, protection of personal data, rights and protection of individuals, conflicts of interest.
- **The training and (further) development of AI applications** - As part of SCOR BR's efforts to improve and develop its business, SCOR BR may use Personal Data to develop and train its artificial intelligence models. The details of what data is processed and how it is used, possibly also using artificial intelligence (AI), depend largely on the services requested or agreed in each case.

Some processing of Personal Data carried out by SCOR BR for the aforementioned purposes may include automated processing methods.

All automated processing, including artificial intelligence, is systematically combined with manual processing. In other words, SCOR BR does not make decisions solely on the basis of automated processing.

**Storage** - SCOR BR stores all Personal Data in the European Union or in Brazil, depending on the systems involved in the data processing operations.

**Retention** - SCOR BR retains Personal Data according to a data storage and retention schedule that is designed to keep Personal Data for as long as SCOR BR may be required to keep it to manage its business and for a reasonable period thereafter. In some cases, SCOR BR may be required to keep Personal Data for a specific period, but in the absence of a specific

legal requirement, SCOR BR will keep Personal Data for a reasonable period for full compliance with its obligations and eventual exercise of its rights.

## Your rights

If you wish to exercise any right relating to your Personal Data, such as the right of access, you can make your request to SCOR BR as indicated below.

You have the right to know whether SCOR BR holds any of your Personal Data. If you wish to receive a copy of the Personal Data that SCOR BR holds about you, please contact SCOR BR's Data Controller. SCOR BR will investigate your request promptly.

However, in certain circumstances, access may be refused if required or permitted by law. For example, access may be refused to your personal information relating to:

- existing legal processes and this information could not be subject to a discovery process,
- information on complaints and investigations,
- legal advice we receive in relation to your claim, or
- when the provision of access poses a serious threat to life, health or safety, or if access may have an unreasonable impact on the privacy of other individuals.

If we refuse to provide access to your personal information, we will explain the reason in writing.

We do not charge a request fee to access your personal information, but we may charge reasonable administrative costs to give you access if your demand is excessive.

If you would like access to your information or to correct personal information we hold about you, please make your request in writing using the contact details provided at the end of this Notice.

## Right to complain

We will make every effort to deal with any complaint about the processing of your personal information. You will receive confirmation that we have received your complaint and the matter will be referred to us for review.

According to articles 17 to 22 of the General Data Protection Law (LGPD), the rights that the holder of personal data has in relation to the data controller are as follows:

### 1. Confirmation of the Existence of Treatment:

- The data subject has the right to obtain confirmation from the controller that their personal data is being processed (Art. 18, I).

### 2. Data Access:

- The data subject can access their personal data processed by the controller (Art. 18, II).

### 3. **Data correction:**

- The data subject can request the correction of incomplete, inaccurate or outdated data (Art. 18, III).

### 4. **Anonymization, Blocking or Deletion of Data:**

- The data subject can request the anonymization, blocking or deletion of data that is unnecessary, excessive or processed in breach of the law (Art. 18, IV).

### 5. **Data portability:**

- The owner can request the portability of data to another service or product provider, upon express request, observing commercial and industrial secrets (Art. 18, V).

### 6. **Data deletion:**

- The data subject may request the deletion of personal data processed with their consent, except in the cases provided for in Art. 16 of the Law (Art. 18, VI).

### 7. **Information on Data Sharing:**

- The data subject has the right to be informed about the public and private entities with which the controller has shared data (Art. 18, VII).

### 8. **Information on Consent:**

- The data subject must be informed of the possibility of not giving consent and of the consequences of refusing to do so (Art. 18, VIII).

### 9. **Revocation of Consent:**

- The holder can revoke consent at any time, under the terms of §5 of Art. 8 of the Law (Art. 18, IX).

### 10. **Petition against the Controller:**

- The data subject has the right to petition the national authority in relation to their data against the controller (Art. 18, § 1).

### 11. **Opposition to Treatment:**

- The data subject may object to processing based on one of the hypotheses for waiving consent, in the event of non-compliance with the law (Art. 18, § 2).

### 12. **Automated Decision Review:**

- The data subject has the right to request a review of decisions taken solely on the basis of automated processing of personal data that affect their interests, including decisions aimed at defining their personal, professional, consumer and credit profile or aspects of their personality. The controller must provide, whenever requested, clear and adequate information about the criteria and procedures used for the automated decision, observing commercial and industrial secrets. If this information is not provided, the national authority may carry out an audit to verify discriminatory aspects in the automated processing of personal data (Art.20, §1 and 2).

### 13. **Defense of Interests in Court:**

- The defense of the interests and rights of data subjects can be exercised in court, individually or collectively, in accordance with the provisions of the relevant legislation (Art. 22).

### **Deadline for reply:**

#### **1. Confirmation of Existence or Access to Data**

- **In simplified format: Immediately:** (Art. 19, I).
- **In the form of a clear and complete statement: Up to 15 days** from the date of the holder's request. The statement must indicate the origin of the data, the lack of registration, the criteria used and the purpose of the processing, with due regard for trade and industrial secrets (Art. 19, II).

By "immediately" it is reasonable to understand that it must be sent within 24 (twenty-four) hours, despite there being no express legal provision as at the date of issue of this Notice.

#### **1.1 Procedures in the Event of Impossibility of Immediate Adoption**

- **Response to the Holder:** In the event that it is impossible to immediately adopt the measure requested by the holder, the controller must send the holder a response in which it may:
  - Communicate that you are not the data processing agent and indicate, whenever possible, the agent (Art. 18, § 4, I).
  - Indicate the reasons of fact or law that prevent the immediate adoption of the measure (Art. 18, § 4, II).

### **Data Protection Officer**

The Data Protection Officer is the professional responsible for informing, advising and coordinating the areas and partners responsible for processing the data entrusted to them, regarding SCOR BR's obligations under the Personal Data Protection Law and other data protection provisions in national and international legislation, in cooperation with the competent supervisory authority.

At SCOR BR, the Data Protection Officer is Isabella Maria Azevedo da Cunha, and her substitute, Marlene Barbosa Pamplona, who can be contacted by e-mail: [privacidade@scor.com](mailto:privacidade@scor.com).

### **Glossary**

**Cedent:** the insurance company that contracts a reinsurance operation or the reinsurer that contracts a retrocession operation.

**Client:** Insurers or cedants authorized to operate by SUSEP.

**Reinsurance Contract:** is the physical or electronic document that represents a risk transfer operation from a cedant to a reinsurer.

**Beneficiaries:** persons indicated by the insured or recognized as such by virtue of the legislation in force or by court decision.

**Confidential Data:** property by which it is ensured that personal data is not available or disclosed to unauthorized persons, companies, systems, bodies or entities.

**System Authentication Data:** any personal data used as a credential to determine access to a system or to confirm the identification of a user, such as login accounts, tokens and passwords.

**Financial Data:** personal data related to the data subject's financial transactions, including for contracting services and purchasing products.

**Personal Data:** Information relating to an identified or identifiable natural person.

**Data Protected by Legal or Judicial Secrecy:** personal data whose secrecy derives from a legal rule or judicial decision.

**Data Protected by Professional Secrecy:** personal data whose secrecy derives from the exercise of a function, ministry, office or profession, and whose disclosure could cause harm to others.

**Sensitive Data:** Personal data on racial or ethnic origin, religious conviction, political opinion, membership of a trade union or religious, philosophical or political organization, data relating to health or sex life, genetic or biometric data, when linked to a natural person.

**Due Diligence:** a set of policies, procedures and internal controls applied continuously to verify the identity and suitability of all clients and business relationships, including third parties and beneficiaries, in order to identify risks of being involved in situations related to money laundering, as well as to prevent and curb the financing of terrorism, in relation to the products marketed, private negotiations, asset purchase and sale operations and other operational practices.

**Handler:** Person appointed by the controller and operator to act as a communication channel between the controller, the data subjects and the National Data Protection Authority (ANPD).

**Business Partners:** companies contracted by SCOR BR to supply it with goods or services.

**Reinsurance:** the transfer of risks from a ceding company, for its own protection, to one or more reinsurers.

**Third parties:** those who may be indemnified, benefit or are related to the acquisition or settlement of insurance.

**Processing:** Any operation carried out with personal data, such as those relating to the collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of the information, modification, communication, transfer, dissemination or extraction.

If you would like more information on privacy legislation or the SCOR BR Privacy Principles, we recommend that you visit the SCOR Group website at <https://www.scor.com/en/privacy-personal-data>.

This Privacy Notice was updated on May 21, 2025.



## Contact and information

**Isabella Maria Azevedo da Cunha**

**Data Protection Officer**

**Marlene Barbosa Pamplona**

**Substitute**

[privacidade@scor.com](mailto:privacidade@scor.com)



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