

Privacy Policy

Privacy Policy

Fortitude Re has adopted this privacy policy (this “**Policy**”) in order to inform you of its policies with respect to the personal information Fortitude Re collects about you through our interactions with you – including through our website located at www.fortitude-re.com (the “**Website**”) and in person visits to Fortitude Re offices and events.

In this Policy, the terms “**Fortitude Re**,” “**we**,” and “**us**” refer to Fortitude Reinsurance Company Ltd., its parent company Fortitude Group Holdings, LLC, and other affiliates (collectively, “Fortitude Re”).

This Policy does not apply to (i) Fortitude Re employees, officers or directors, or job applicants seeking opportunities at Fortitude Re, (ii) personnel working on behalf of Fortitude Re’s vendors, or (iii) consumer information collected, processed, sold, or disclosed pursuant to the Gramm-Leach-Bliley Act as implemented by various state insurance laws and regulations or the California Financial Information Privacy Act, about which customers receive an annual privacy notice. Copies of our customer privacy notices can be found [here](#).

By using our website or interacting with us, you consent to the terms of this Policy.

Categories of Personal Information We Collect and How We Use It

We collect the following categories of personal information about you online or offline, depending on the context, and have collected the following categories of personal information about individuals in the preceding 12 months:

- **Identifiers:** identifiers, such as a real name, postal address(es), unique personal identifier (such as a device identifier; cookies; customer number, unique pseudonym, or user alias; telephone number and other forms of identifiers), online identifier, internet protocol address, email address, driver’s license or equivalent government identification number, date and/or place of birth, IP address, your signature, and other similar identifiers.

- **Medical Data:** medical and health information such as vaccination status in response to public health guidance or mandates from government authorities.
- **Protected Classifications:** characteristics of protected classifications under California or federal law, including but not limited to race, color, national origin, religion, age, sex, gender, marital status, disability, citizenship status, and military and veteran status.
- **Geolocation:** general location information from your IP address.
- **Online Activity:** Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with our websites.
- **Sensory Information:** audio, electronic, and video recordings.
- **Employment Information:** professional or employment-related information, such as job title and salary, resume, and professional profiles you have created, e.g., on LinkedIn.
- **Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We generally use the categories of personal information listed above to operate and maintain our website; assist us in our recruitment efforts; and to maintain a safe environment for our visitors and guests.

Specifically, we use the following categories of personal information for the following purposes:

Purposes	Categories of Personal Information
Complying with applicable laws or rules of local or foreign regulatory or law enforcement authorities.	<ul style="list-style-type: none"> • Identifiers • Protected Classifications • Geolocation • Online Activity • Employment Information
Recruiting efforts, including to identify potential job applicants.	<ul style="list-style-type: none"> • Identifiers • Protected Classifications • Geolocation • Online Activity

Purposes	Categories of Personal Information
	<ul style="list-style-type: none"> • Employment Information • Inferences
Ensuring a safe and healthy office environment for our employees and visitors.	<ul style="list-style-type: none"> • Identifiers • Medical data • Inferences
Responding to inquiries and providing announcements about future events and opportunities.	<ul style="list-style-type: none"> • Identifiers • Online Activity • Sensory Information • Inferences
Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and assisting in the prosecution of those responsible for that activity.	<ul style="list-style-type: none"> • Identifiers • Online Activity • Sensory Information • Geolocation • Employment Information • Inferences
Debugging to identify and repair errors that impair existing intended functionality, such as on our website.	<ul style="list-style-type: none"> • Identifiers • Online Activity • Sensory Information
Undertaking internal research for data modeling and analytics.	<ul style="list-style-type: none"> • Identifiers • Online Activity • Geolocation • Inferences
Undertaking activities to verify or maintain the quality of our services and/or to improve, upgrade, or enhance those services.	<ul style="list-style-type: none"> • Identifiers • Protected Classifications • Online Activity • Sensory Information • Geolocation • Inferences

How We Collect Personal Information

In connection with your interactions with us, we may collect personal information from you or from other sources. This information may be information that you

directly provide to us, such as information that you provide when you visit our offices, or information that is passively or automatically collected from you, such as information collected from your browser or device. The personal information we collect may identify you directly (e.g., your name).

In some instances, Fortitude Re may also collect information from third-party sources, upon whom we rely on to provide us with services, such as website analytics.

In response to public health guidance or mandates from government authorities, we collect health data from our visitors as we deem appropriate to provide a safe space for them and our employees.

We collect personal information from various sources, depending on the context, as described below:

- Directly from you, such as when you attend an event that we have organized or you provide information through surveys, emails, calls, forms, and other features on our website or interactions with our LinkedIn page, or that you have made available on your LinkedIn profile;
- Meetings, telephone conversations, and other interactions with you;
- From your devices, such as when you visit our website;
- Our affiliates;
- Service providers, including administrative agents;
- Website analytics service providers, such as Google Analytics.

How We Disclose Information

Fortitude Re discloses personal information with certain categories of third parties for business, commercial, and legal purposes, depending on the context. We share personal information with affiliated companies, as well as service

providers and vendors whom we rely on to operate our business and comply with applicable law. These companies need information about you to perform their service function.

We engage Google to help us understand and improve our site. Google may collect certain technical or other information from you (e.g., clickstream information, browser type, time and date, hardware/software information, cookie ID, IP address, etc.) when you visit our Website.

Please note that this Policy is not intended to limit our ability to disclose aggregated, pseudonymized, or anonymized data. Fortitude Re also reserves the right to use or disclose information as needed to satisfy any law, regulation or legal request, to fulfill your requests, to cooperate in any law enforcement or similar investigation, or to conduct any internal investigation or similar function we deem appropriate to protect our business.

Fortitude Re does not sell personal information and has not sold personal information in the past 12 months. Fortitude Re also does not share personal information for cross-context behavioral advertising purposes.

We have disclosed the following categories of personal information to the following categories of third parties in the past 12 months:

Category of Personal Information	Categories of Third Parties
<ul style="list-style-type: none">• Identifiers	<ul style="list-style-type: none">• Vendors who provide services to us, such as IT and software services and accountants• Professional services organizations, such as auditors, recruitment agencies, and law firms• Our affiliates, including our entities with a common Fortitude Re identity• Third-party service providers• Website analytics service providers• Government authorities and law enforcement
<ul style="list-style-type: none">• Online Activity	<ul style="list-style-type: none">• Vendors who provide services to us, such as IT and software services and accountants• Our affiliates, including our entities with a common Fortitude Re identity

Category of Personal Information	Categories of Third Parties
	<ul style="list-style-type: none"> • Third-party service providers • Website analytics service providers
<ul style="list-style-type: none"> • Geolocation 	<ul style="list-style-type: none"> • Vendors who provide services to us, such as IT and software services and accountants • Third-party service providers • Website analytics service providers
<ul style="list-style-type: none"> • Sensory Information 	<ul style="list-style-type: none"> • Vendors who provide services to us, such as IT and software services and accountants • Third-party service providers

Further, we may transfer personal information in the event of a merger, acquisition, bankruptcy, or other transaction in which the third party assumes control of all or part of our business.

How We Protect Your Information

We maintain administrative, technical, and physical safeguards to protect your personal information.

Data Retention

We retain your information only for as long as is reasonably necessary, or for other necessary purposes such as complying with our legal obligations, resolving disputes, and enforcing our agreements.

Cookies

The Website uses cookies, including for Google Analytics. A “cookie” is a small piece of data that can be sent by a web server to your computer, which then may be stored by your browser on your computer or device. Cookies and browser

storage allow us to recognize your computer or device while you are on our Website and understand traffic to our Website.

Most web browser applications (such as Microsoft Internet Explorer, Google Chrome, Firefox and Apple Safari) have features that can notify you when you receive a cookie or prevent cookies from being sent. Through most browsers, you can request to block, manage, or delete cookies or local storage through the browsers' privacy features. Your browser may also allow you to manage other similar technologies, such as local storage objects. Fortitude Re does not currently respond to "do-not-track" browser settings.

Links to Other Sites and Social Media

In some areas of the Website, we provide a link to other websites as a convenience to you. These external websites, including, have their own policies regarding privacy and security, and these may vary from ours. If you choose to visit these external websites, you will be subject to the privacy practices of those external websites, which we encourage you to be aware of and to read.

Children's Privacy

Our website and business are directed toward and designed for use by persons aged 16 or older. We do not knowingly solicit or collect personal information from individuals under the age of 16.

If you have reason to believe that a person under the age of 16 has provided personal data to us without parental consent, please contact us using any of the methods described in the "Contact Us" section of this Policy, and we will endeavor to delete that data from our systems.

California Residents

This section supplements our Policy with additional information for California residents only. This California Privacy Policy uses certain terms that have the

meanings given to them in the California Consumer Privacy Act of 2018 and/or its implementing regulations (the “CCPA”).

You have certain rights regarding your personal information, as described below.

Access: You have the right to request, twice in a 12-month period, that we disclose to you the information we collect, use, and disclose, specifically:

- The categories of the personal information we have collected about you during the past 12 months;
- the categories of sources from which your personal information was collected during the past 12 months;
- the business or commercial purposes for collecting your personal information during the past 12 months;
- the categories of third parties with whom we disclose your personal information; and
- the specific pieces of your personal information we collected about you.

Deletion: You have the right to request that we delete certain personal information we have collected from you. Please note that we may not be able to delete your data if we need it to comply with legal obligations or otherwise have reason to retain your information for a lawful purpose.

Non-Discrimination: If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by us.

How to Submit a Request

To submit an access or deletion request, call our toll-free number at 1-888-729-9399. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

Verifying Requests

To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. If you request access to or deletion of your personal information, we may require you to provide any of the following information: full name, address, email address, and/or phone number. In addition, if you ask us to provide you with specific pieces of personal information,

we will require you to sign a declaration under penalty of perjury that you are the individual whose personal information is the subject of the request. If you designate an authorized agent to make an access or deletion request on your behalf (a) we may require you to provide the authorized agent written permission to do so, and (b) for access and deletion requests, we may require you to verify your own identity directly with us (as described above).

Non-U.S. Visitors' Rights

Fortitude Re's business is directed to United States customers. Non-U.S. persons, including persons visiting our U.S.-based physical or digital locations from other countries, should be aware that in visiting us you are agreeing to be subject to U.S. privacy law rather than the laws of your home country.

Changes to This Privacy Policy

This Policy went into effect, and was last revised, on the dates noted at the top of this webpage. We may update this Policy from time to time. If we make material changes, we will post the updated Policy on this page and change the date at the top of this webpage. We encourage you to look for updates and changes to this Policy periodically. Your continued interaction with us after any changes to this Policy are in effect constitutes your acceptance of revisions to the Policy.

Contact Us

We welcome your questions, comments, and concerns about privacy. You can contact Fortitude Re by phone at 1-888-729-9399. Please include your first and last name and your phone number at which we can reach you.

This Policy is available in alternative formats upon request. Please contact our toll-free number at 1-888-729-9399 to request this Policy in an alternative format.

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