



PRIVACY POLICY

American & Overseas Reinsurance Management Company Ltd.

1. INTRODUCTION

American & Overseas Reinsurance Management Company Ltd. (BMA Registration No. 15510) ("American & Overseas", "we", "us", or "our") is a licensed insurance manager regulated by the Bermuda Monetary Authority ("BMA") under the Insurance Act 1978 of Bermuda.

We are committed to protecting the privacy and personal information of all individuals with whom we interact, including clients, prospective clients, business contacts, counterparties, service providers, and visitors to our website. This Privacy Policy explains how we collect, use, disclose, retain, and protect personal information in accordance with the Personal Information Protection Act 2016 ("PIPA") of Bermuda.

As a BMA-regulated entity, we also operate in compliance with applicable international data protection frameworks relevant to the jurisdictions in which our clients and counterparties are located, including but not limited to the United States, the United Kingdom, the European Union, and Asia-Pacific markets.

By engaging with us, accessing our website, or providing us with your personal information, you acknowledge that you have read and understood this Privacy Policy.

2. WHO WE ARE — OUR ROLE AS A CONTROLLER

For the purposes of PIPA and applicable data protection laws, American & Overseas acts as a "controller" (also referred to as an "organisation" under PIPA) in respect of the personal information we collect and process. This means we are responsible for deciding how and why personal information about you is used.

Where we engage third-party service providers who process personal information on our behalf, those parties act as processors and are required by contract to process personal information only on our documented instructions and with appropriate security safeguards.

Our principal activities as an insurance manager include the management of captive and specialty reinsurance structures on behalf of clients domiciled across multiple international jurisdictions. In this capacity, we may receive and process personal information relating to clients, their officers, directors, beneficial owners, insureds, and other related parties.

3. WHAT PERSONAL INFORMATION WE COLLECT

The personal information we collect will depend on your relationship with us. We collect and process the following categories of personal information:

3.1 Client and Business Contact Information

- Full name, title, and professional role
- Business and/or residential address
- Email address and telephone number(s)



- Company name, structure, and registration details
- Beneficial ownership and director/officer information (as required by BMA regulations and anti-money laundering obligations)
- Professional qualifications and credentials
- Correspondence and communication records

3.2 Due Diligence and Regulatory Compliance Information

As a BMA-regulated entity, we are required by law to collect and verify certain information for Know Your Customer (KYC), Anti-Money Laundering (AML), and regulatory compliance purposes. This may include:

- Government-issued identity documents (passport, national ID)
- Proof of address documentation
- Source of funds and source of wealth information
- Politically Exposed Person (PEP) and sanctions screening results
- Beneficial ownership declarations and corporate structure charts
- Criminal record declarations (where required by applicable law or regulatory guidance)

3.3 Financial and Insurance-Related Information

- Policy details, coverage terms, and claims history
- Financial statements and actuarial data
- Premium payment and billing information
- Banking and wire transfer details
- Risk assessment and underwriting information

3.4 Website and Technical Information

When you visit our website, we may automatically collect certain technical information, including:

- IP address and browser type
- Pages visited and time spent on site
- Referring website and search terms
- Cookie and tracking data (subject to our Cookie Policy)

3.5 Sensitive Personal Information

We do not routinely collect sensitive personal information (as defined under PIPA, including health data, biometric data, or information revealing racial or ethnic origin). Where such information is required for a specific regulatory or legal purpose, we will obtain your explicit consent in advance and will clearly explain the purpose for collection.

4. HOW WE COLLECT PERSONAL INFORMATION

We collect personal information from the following sources:

- **Directly from you:** through engagement letters, account opening forms, onboarding questionnaires, correspondence, meetings, telephone calls, and our website.
- **From your employer or organisation:** where you are acting on behalf of a corporate client, insured, or counterparty.



- **From third-party due diligence providers:** including sanctions screening services, credit reference agencies, and identity verification platforms.
- **From public sources:** including company registries, BMA public records, court records, and publicly available regulatory filings.
- **From regulatory bodies:** including the BMA, other insurance regulators, and tax authorities, where we are required or permitted to do so.
- **From our affiliated companies:** within our corporate group, where relevant to the services we provide.

5. HOW WE USE PERSONAL INFORMATION

We use personal information for the following purposes, each supported by a lawful basis under PIPA:

Purpose	Description	Lawful Basis (PIPA)
Insurance Management Services	Providing captive and specialty reinsurance management services to clients	Performance of a contract / Legitimate interest
Regulatory Compliance (KYC/AML)	Fulfilling BMA-mandated obligations including KYC, AML, sanctions screening, and regulatory reporting	Legal obligation
Client Onboarding	Establishing the client relationship, conducting due diligence, and setting up accounts and structures	Performance of a contract / Legal obligation
Communication and Administration	Responding to enquiries, managing correspondence, and administering our business relationship	Legitimate interest
Risk and Actuarial Analysis	Assessing and managing insurance and reinsurance risk on behalf of clients	Performance of a contract / Legitimate interest
Legal and Regulatory Reporting	Complying with court orders, regulatory requests, tax obligations, and mandatory disclosure requirements	Legal obligation

We will not use your personal information for purposes that are incompatible with those stated above without first notifying you and, where required, obtaining your consent.

6. AUTOMATED DECISION-MAKING

We do not make decisions about you that have a significant legal or similarly significant effect based solely on automated processing of your personal information. Where automated tools are used (for example, in sanctions screening), the output is always reviewed by a qualified member of our team before any decision is made.

7. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

As an internationally active insurance manager serving clients across the United States, United Kingdom, Europe, Asia, and other markets, we may transfer personal information across borders in the ordinary course of our business. Such transfers may occur when:

- Our clients, insureds, or counterparties are located outside Bermuda
- We engage service providers or technology platforms located outside Bermuda
- We are required to report to regulators or tax authorities in other jurisdictions
- We correspond with reinsurers, brokers, or cedants located in other countries



Where personal information is transferred outside Bermuda, we take steps to ensure that appropriate safeguards are in place, which may include:

- Contractual protections (including data processing agreements and standard contractual clauses)
- Transfers to jurisdictions that provide an adequate level of data protection
- Transfers required by law or necessary for the performance of a contract to which you are a party

Where you are a client or contact based in the United States, European Union, United Kingdom or Asia, we will also seek to ensure compliance with applicable data protection requirements of those jurisdictions to the extent relevant to our processing activities.

8. WHO WE SHARE PERSONAL INFORMATION WITH

We may share your personal information with the following categories of recipients, always on a need-to-know basis and subject to appropriate contractual and security safeguards:

- **BMA and Other Regulators:** We are required to make regulatory submissions, respond to regulatory enquiries, and report certain information to the BMA and other relevant authorities.
- **Affiliated Companies:** We may share information within our corporate group (including Accelerate Bermuda Group Ltd. and its subsidiaries) where necessary for the delivery of services or for internal administrative purposes.
- **Reinsurers, Brokers, and Cedants:** In connection with the management of insurance and reinsurance structures, we may share relevant information with underwriters, brokers, and counterparties.
- **Professional Advisors:** Including legal counsel, auditors, actuaries, and tax advisors who require access to personal information in connection with their professional services to us.
- **Technology and Service Providers:** Including cloud hosting providers, IT security services, and business software platforms. All such providers are required to process personal information only on our instructions and with appropriate security measures.
- **Due Diligence Providers:** Including KYC, AML, and identity verification platforms used in our compliance processes.
- **Courts and Legal Proceedings:** Where required by court order, legal process, or applicable law.
- **Successor Entities:** In the event of a merger, acquisition, or sale of all or substantially all of our business, personal information may be transferred to the relevant successor, subject to equivalent privacy protections.

We do not sell, rent, or otherwise commercialise your personal information to third parties.

9. DATA SECURITY

We maintain appropriate technical and organisational measures to protect personal information against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. These measures include:

- Encryption of data in transit and at rest
- Access controls and authentication requirements
- Regular security assessments and staff training
- Confidentiality obligations for all staff and contractors with access to personal information
- Incident response and breach notification procedures



In the event of a personal information breach that poses a risk of harm to individuals, we will notify the Privacy Commissioner of Bermuda and affected individuals in accordance with our obligations under PIPA and any other applicable law.

10. HOW LONG WE RETAIN PERSONAL INFORMATION

We retain personal information for as long as is necessary to fulfil the purposes for which it was collected, to comply with our legal and regulatory obligations, and to protect our legitimate interests. Our standard retention periods are as follows:

Category	Retention Period	Basis
Client relationship records	Duration of engagement + 7 years	Legal / Regulatory obligation
KYC / AML documentation	Duration of relationship + 6 years (minimum)	BMA / PIPA / BFIU requirement
Regulatory filings and correspondence	7 years	Insurance Act / BMA requirement
Financial records	7 years	Companies Act / Tax obligation
Website visitor data (logs)	12 months	Security / Legitimate interest

When personal information is no longer required, it will be securely deleted, anonymised, or destroyed in accordance with our data disposal procedures.

11. YOUR RIGHTS UNDER PIPA

Under PIPA and, where applicable, other data protection laws relevant to your jurisdiction, you have the following rights in relation to your personal information:

Right of Access	You may request a copy of the personal information we hold about you and information about how it is being used.
Right to Correction	You may request that we correct any inaccurate or incomplete personal information we hold about you.
Right to Withdraw Consent	Where processing is based on your consent, you may withdraw consent at any time. Withdrawal does not affect the lawfulness of processing before withdrawal.
Right to Object	You may object to the processing of your personal information where we rely on legitimate interests as the lawful basis, subject to our overriding legitimate grounds.
Right to Restriction	You may request that we restrict the processing of your personal information in certain circumstances.
Right to Deletion	You may request erasure of your personal information where there is no compelling reason for us to continue processing it, subject to our legal and regulatory retention obligations.
Right to Complain	You have the right to lodge a complaint with the Office of the Privacy Commissioner for Bermuda (PrivCom) if you believe we have not handled your personal information in accordance with PIPA.

To exercise any of these rights, please contact us using the details in Section 13 below. We will respond within 30 days of receiving your request. We may need to verify your identity before processing your request.

Please note that certain rights may be limited or overridden where we are required by law to retain or process your information, or where the exercise of a right would adversely affect the rights and freedoms of others.

12. COOKIES AND WEBSITE TRACKING

Our website may use cookies and similar tracking technologies to enhance your browsing experience and to gather aggregate statistical information about website usage. Cookies are small text files stored on your device when you visit our website.



We use the following types of cookies:

- **Essential cookies:** Required for the website to function properly. These cannot be disabled.
- **Analytics cookies:** Used to understand how visitors interact with the website (e.g., pages visited, time spent). Data is aggregated and anonymised where possible.
- **Preference cookies:** Used to remember your settings and preferences.

You can control and manage cookies through your browser settings. Disabling certain cookies may affect the functionality of our website. By continuing to use our website, you consent to our use of cookies as described above.

Our website may contain links to third-party websites. We are not responsible for the privacy practices of those websites and encourage you to review their privacy policies separately.

13. CONTACT US AND PRIVACY OFFICER

If you have any questions, concerns, or requests relating to this Privacy Policy or the handling of your personal information, please contact us our Privacy Officer:

Field	Details
Company	American & Overseas Reinsurance Management Company Ltd.
Address	29 Front Street, Hamilton HM11, Bermuda
Email	spearce@captivemanagers.com or jaydealbertze@aormc.com

14. CHANGES TO THIS PRIVACY POLICY

We reserve the right to update or amend this Privacy Policy from time to time to reflect changes in our business practices, applicable law, or regulatory requirements. Any material changes will be posted on our website with an updated effective date. We encourage you to review this Policy periodically.

Where changes are material and affect the way we process your personal information, we will notify you directly where we have your contact details and where required by applicable law.

Continued use of our website or services following the posting of changes constitutes your acceptance of the Privacy Policy.