

DATA TRANSFER AGREEMENT

This Data Transfer Agreement is made on 11 September 2026 (the **Effective Date**) between each "data exporter" and each "data importer" listed in Annex I to facilitate the mutual sharing of personal data between the parties in connection with the proposed acquisition of Beazley plc by Zurich Insurance Group Ltd (the **Proposed Transaction**) and the subsequent integration of the parties' businesses following completion of the Proposed Transaction.

1. EU Transfers. To the extent that any data exporter whose processing of personal data is subject to the EU GDPR transfers personal data to a data importer outside the UK or EEA, such parties will be deemed to have entered into the standard contractual clauses approved by the European Commission Implementing Decision (EU) 2021/914 of 4 June 2021 available at http://data.europa.eu/eli/dec_impl/2021/914/oj (**Clauses**) in respect of such transfer, whereby:

- a. Module One applies and Modules Two, Three and Four are omitted;
- b. the footnotes, Clause 11(a) Option and Clause 17 Option 1 are omitted;
- c. the Clauses are governed by the law of the country where the data exporter is established or, where the data exporter is not established in a Member State, the governing law shall be Irish law; and
- d. any dispute arising from the Clauses shall be resolved by the courts of the country where the data exporter is established or, where the data exporter is not established in a Member State, any disputes shall be resolved in Irish courts.

2. UK Transfers. To the extent that any personal data is transferred from a data exporter whose processing of personal data is subject to the UK GDPR to a data importer, such parties will be deemed to have entered into the UK International Data Transfer Addendum to the EU Commission Standard Contractual Clauses, which is Part 2: Mandatory Clauses of the Approved Addendum, being the template Addendum B.1.0 issued by the ICO and laid before Parliament in accordance with s119A of the Data Protection Act 2018 on 2 February 2022, as it is revised under Section 18 of those Mandatory Clauses, and which is in force as of 21 March 2022, available at <https://ico.org.uk/media2/migrated/4019539/international-data-transfer-addendum.pdf>, as may be amended or superseded from time to time (**UK Addendum**), in respect of such transfers, whereby the Clauses as implemented in Section 1 above shall apply subject to the modifications below:

- a. in table 1 in Part 1 of the UK Addendum, each data exporter whose processing of personal data is subject to the UK GDPR shall be deemed a data exporter to the extent it transfers relevant personal data to a data importer, in each case with full details as set out in this Agreement;
- b. the information in Section 1 above shall apply in table 2 in Part 1 of the UK Addendum;
- c. table 3 in Part 1 of the UK Addendum shall be completed with the details in Annex I and II below, and the list of parties in Annex IA shall be as set out in Section 2(a) above; and
- d. table 4 in Part 1 of the UK Addendum is completed by selecting "neither party".

3. Counterparts. This Data Transfer Agreement may be executed electronically and in counterparts.

ANNEX I

A. LIST OF PARTIES

Data exporter(s):

Names and addresses:

1) Beazley PLC

- Name: Beazley PLC
- Address: 22 Bishopsgate, London, EC2N 4BQ

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: UK DPO
- Contact details: [REDACTED]

2) BIDAC

- Name: Beazley Insurance dac (BIDAC)
- Address: 2 Northwood Avenue, Northwood Business Campus, Santry, Dublin 9, D09 X5N9, Ireland

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: UK DPO
- Contact details: [REDACTED]

3) BSIL

- Name: Beazley Solutions International Ltd
- Address: 2 Northwood Avenue, Northwood Business Campus, Santry, Dublin 9, D09 X5N9, Ireland

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: UK DPO

Contact details: [REDACTED]

4) BUSA

- Name: Beazley USA Services, Inc.
- Address: Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: US DPO

Contact details: [REDACTED]

5) **BML**

- Name: Beazley Management Ltd.
- Address: 22 Bishopsgate, London, United Kingdom, EC2N 4BQ

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: UK DPO

Contact details: [REDACTED]

6) **Zurich American Insurance Company**

Names and addresses:

- Name: Zurich American Insurance Company
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

7) **American Guarantee and Liability Insurance Company**

Names and addresses:

- Name: American Guarantee and Liability Insurance Company
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

8) **American Zurich Insurance Company**

Names and addresses:

- Name: American Zurich Insurance Company
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

9) **Empire Fire and Marine Insurance Company**

Names and addresses:

- Name: Empire Fire and Marine Insurance Company
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

10) **Empire Indemnity Insurance Company**

Names and addresses:

- Name: Empire Indemnity Insurance Company
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

11) **Steadfast Insurance Company**

Names and addresses:

- Name: Steadfast Insurance Company
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

12) **Zurich American Insurance Company of Illinois**

Names and addresses:

- Name: Zurich American Insurance Company of Illinois
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

13) **SpearTip, LLC**

Names and addresses:

- Name: SpearTip, LLC
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

14) **The Zurich Services Corporation**

Names and addresses:

- Name: The Zurich Services Corporation
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

Activities relevant to the data transferred under these Clauses: Disclosure of clearance and registration records and broker relationship records to the data importer to enable assessment of the overlap between the parties' broker relationships and submission pipelines in connection with the Proposed Transaction, and to facilitate the integration.

Data importer(s):

1) **Zurich American Insurance Company**

Names and addresses:

- Name: Zurich American Insurance Company
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

2) **American Guarantee and Liability Insurance Company**

Names and addresses:

- Name: American Guarantee and Liability Insurance Company
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

3) **American Zurich Insurance Company**

Names and addresses:

- Name: American Zurich Insurance Company
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

4) **Empire Fire and Marine Insurance Company**

Names and addresses:

- Name: Empire Fire and Marine Insurance Company
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

5) **Empire Indemnity Insurance Company**

Names and addresses:

- Name: Empire Indemnity Insurance Company
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

6) **Steadfast Insurance Company**

Names and addresses:

- Name: Steadfast Insurance Company
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

7) **Zurich American Insurance Company of Illinois**

Names and addresses:

- Name: Zurich American Insurance Company of Illinois
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

8) **SpearTip, LLC**

Names and addresses:

- Name: SpearTip, LLC
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer
- Contact details: [REDACTED]

9) **The Zurich Services Corporation**

Names and addresses:

- Name: The Zurich Services Corporation
- Address: 1299 Zurich Way, Schaumburg, Illinois, 60196

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: Data Privacy Officer

Contact details: [REDACTED]

10) **BUSA**

- Name: Beazley USA Services, Inc.
- Address: Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801

Role (controller/processor): Controller

Contact person's name, position and contact details:

- Name: [REDACTED]
- Position: US DPO

Contact details: [REDACTED]

Activities relevant to the data transferred under these Clauses: Receipt, storage and analysis of clearance and registration records, and broker relationship records to assess the overlap between the parties' broker relationships and submission pipelines in connection with the Proposed Transaction, and to facilitate the integration.

B. DESCRIPTION OF TRANSFER

Categories of data subjects whose personal data is transferred: Employees, including their names, titles and work contact information; customers, including policyholder details;

brokers, including their names and contact details; and third parties whose information is contained within the relevant records.

Categories of personal data transferred: Names, contact details, job titles and other business data required to support migration, testing, validation, operational readiness and production support activities.

Sensitive data transferred (if applicable) and applied restrictions or safeguards that fully take into consideration the nature of the data and the risks involved, such as for instance strict purpose limitation, access restrictions (including access only for staff having followed specialised training), keeping a record of access to the data, restrictions for onward transfers or additional security measures: No

The frequency of the transfer (e.g. whether the data is transferred on a one-off or continuous basis): The frequency of the transfer will be on a continuous basis. The personal data will be provided via API integrations, SharePoint online file shares & secure file transfer.

Nature of the processing: Transfer of submission clearance, registration, customer policy information and broker relationship records to identify overlap and gaps between the parties' insurance portfolios.

Purpose(s) of the data transfer and further processing: To enable the data importer to assess the degree of overlap between the parties' broker relationships and submission pipelines and to identify gaps, and to facilitate the integration. The data importer shall not process the personal data for any other purpose.

The period for which the personal data will be retained, or, if that is not possible, the criteria used to determine that period: The personal data will be retained by the data importer in accordance with the data importer's retention policies (provided that this is held in accordance with applicable data protection laws).

For transfers to (sub-) processors, also specify subject matter, nature and duration of the processing: N/A

C. COMPETENT SUPERVISORY AUTHORITY

Identify the competent supervisory authority/ies in accordance with Clause 13:

The competent supervisory authority is that in the country where the data exporter is established.

**ANNEX II - TECHNICAL AND ORGANISATIONAL MEASURES INCLUDING
TECHNICAL AND ORGANISATIONAL MEASURES TO ENSURE THE SECURITY OF
THE DATA**

Description of the technical and organisational measures implemented by the data importer(s) (including any relevant certifications) to ensure an appropriate level of security, taking into account the nature, scope, context and purpose of the processing, and the risks for the rights and freedoms of natural persons.

The data importer will implement, document, maintain, and as appropriate, review, test and update policies and procedures that contain administrative, physical and technical safeguards relevant to the access, use, loss, alteration, disclosure, storage, destruction and control of information and which are measured against objective standards and controls ("Information Security Program"). The data importer's information security programme shall:

- include the implementation of appropriate technical and organisational measures to ensure a level of security appropriate to the risk related to processing of personal data received from data exporter;
- take account in particular of the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed;
- on an ongoing basis, account and monitor for known and reasonably anticipated internal and external risks, threats and vulnerabilities;
- designate one or more individuals to maintain data importer's information security programme;
- include appropriate training and awareness to all personnel; and
- include appropriate governance mechanisms to verify the effectiveness of technical and organisational measures.

The data importer's information security programme shall be in writing, and will include, at a minimum, the following technical and organisational measures:

1. Physical security measures

Measures taken for protecting the physical premises where personal data may be processed:

- Entry restriction, access controls, and authorisation management
- Entry control safeguards for visitors, including supervision of visitors while within the premises
- Automated physical security monitoring measures, such as an alarm system, video surveillance, motion detectors, and/or security guards
- Additional entry control restrictions for limiting access to higher-security areas, such as server rooms or data centres, on a needs-access basis and logging such access

2. Technical security measures

Measures taken to protect personal data on IT systems and equipment:

- Standardised procedures for managing user accounts on IT systems (e.g., identity management system for authorizing/setting up/modifying/deleting of an account)
- Restricted granting of rights and permissions / differentiation of rights and permissions for the respective users (e.g., admin rights and permissions) on a need-to-know basis
- Disabling / deletion of inactive accounts, and periodic checks for accounts that should be disabled or deleted (e.g., due to an employee's departure or reassignment)
- Password guidelines
 - Requirements for minimal strength of password
 - Technically mandatory change of the initial password
 - Periodic change of password
 - Prohibition on sharing passwords
 - Instructions to keep passwords secret and secure
- Security software, including firewalls, anti-virus, anti-malware and anti-spyware with detection, response, and eradication performed on a timely basis
- Network controls to prevent and detect malicious activities and segregate physical and logical access
- Logging and monitoring of access to IT systems, and procedures to identify suspicious access to such IT systems, with audit logs retained for at least 12 months where appropriate having regard to applicable legal, regulatory, security and operational requirements
- Continuous security monitoring and incident detection controls appropriate to the nature and risk of the relevant IT systems and data
- Controls for appropriate retention, handling and destruction of information
- Change control including provisioning and de-provisioning as appropriate
- Segregation of duties implemented at key operational points
- Secure maintenance of IT systems, including building, operating, managing, and administering systems with security safeguards and system patching
- Security measures upon repeated failed login attempts, including locking the account automatically after a specified number of failed login attempts
- Multifactor authentication for access to company IT systems, including for privileged and remote access where technically feasible, with appropriate compensating controls applied where multifactor authentication cannot be supported
- Instructions on appropriate handling, use, and security of company-issued mobile devices for company business
- Technical separation of business and personal communication on company-issued devices (to the extent personal use is allowed)
- Policies and procedures regarding the use of personal mobile devices for company business, including required security measures (such as mobile device management software) where such use is permitted
- Policies and procedures regulating secure use of USB drives and other portable media for protecting company data
- Secured means of transport and couriers when transporting data storage devices
- System for securely destroying decommissioned data storage devices and storage media using industry standard procedures
- Backup and disaster recovery emergency plans
- Encryption of personal data when transmitted and stored electronically, using recognised industry standards appropriate to the risk, including AES-256 or

equivalent encryption at rest and TLS 1.2 or above, or equivalent protection, for data in transit

3. Organisational measures

- Requiring that any individual or entity acting under the authority of data importer and who has access to personal data does not process such data except as required to do so, unless required to do so by applicable law
- Data protection and confidentiality obligations for employees or other individuals or entities acting under the authority of data importer
- Acceptable use policy for IT assets owned by data importer, and used for processing personal data
- Access control and management including the identification, authentication and control of access to, and use of, information, facilities, networks, computers and software including deactivation of credentials when no longer needed
- Training for personnel on appropriate handling and security of personal data
- Contractual agreements, including with service providers / subcontractors, requiring that any third party with access to data exporter data or systems, or to data importer systems that allow such access has in place substantially similar security safeguards and controls as those set forth herein, and monitoring such third parties as appropriate and as may be required by applicable law
- Reviews of third parties with access to data exporter data or systems or data importer systems that allow such access
- Policies for appropriate retention, handling and destruction of information
- Restrictions on use or publication of data exporter information
- Documented data security incident response procedures

Executed on as of the Effective Date by the duly authorised representatives of the parties.

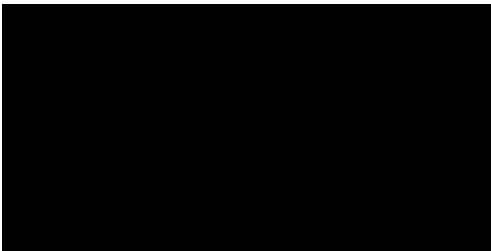
BEAZLEY PLC



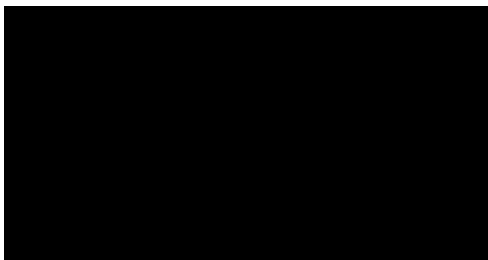
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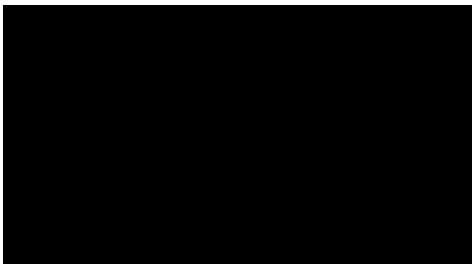
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BEAZLEY USA SERVICES INC



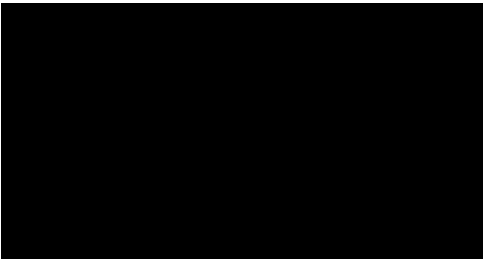
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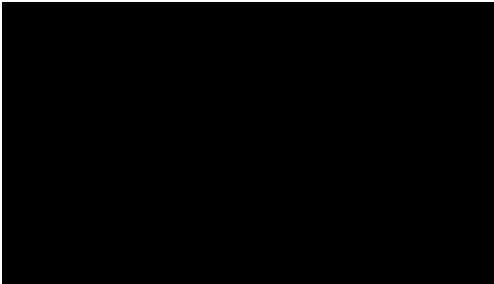
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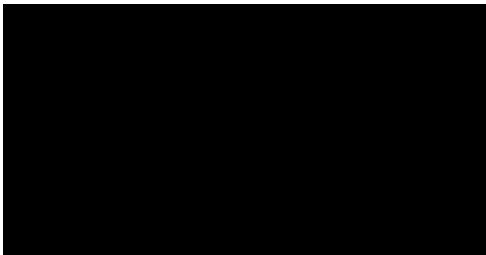
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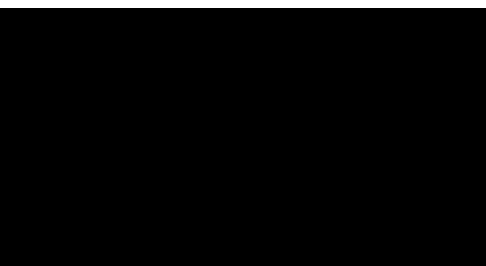
AMERICAN ZURICH INSURANCE COMPANY



EMPIRE FIRE AND MARINE INSURANCE COMPANY



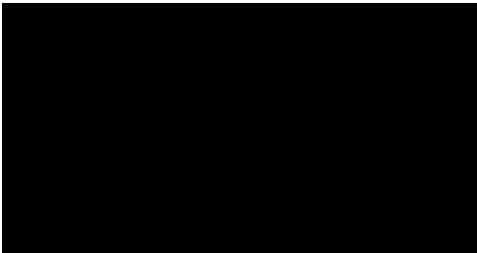
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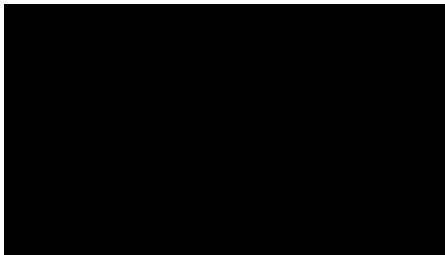
STEADFAST INSURANCE COMPANY



ZURICH AMERICAN INSURANCE COMPANY OF ILLINOIS



SPEARTIP, LLC



THE ZURICH SERVICES CORPORATION

