



DATA PROTECTION NOTICE

The protection of your personal data is very important to the BNP Paribas Group, which has adopted strong guiding principles in that respect for the entire Group in its "Group Privacy Policy".

This Data Protection Notice provides you with detailed information on how CARDIF LUX VIE (hereinafter referred to as "we") protects your personal data.

In our capacity of data controller, we are responsible for collecting and processing your personal data in relation to our activities. The purpose of this Data Protection Notice is to inform you about the data we collect about you, the reasons why we use and share this data, the applicable storage periods, and what are your rights and how you can exercise them.

Further information, if required, may be provided in the "Protection of personal data" clause of your policy.

1. WHAT PERSONAL DATA DO WE USE?

We collect and use your personal data to the extent necessary in the context of our activities and we do so in order to ensure that our policies are highly tailored to your needs.

Depending, among other things, on the type of policies we provide to you, we may collect various types of personal data about you, including:

- **Information to identify you** (e.g. name, identity card and passport, driving licence, residence permit or visa, nationality, place and date of birth, gender, identity photo, IP address);
- **Contact details** (e.g. postal address and e-mail address, phone number, fax number);
- **Family situation** (e.g. marital status, special legal regime applicable to your family, identity of ascendant and descendant relatives, number of persons in the household, number and age of children, number of pets);
- **Economic, financial and tax information** (e.g. tax ID, tax status, income and other revenues, value of your assets, bank account details, number and expiry date of your bank card);
- **Information regarding your studies and professional situation** (e.g. level of study, job, name of employer, salary);
- **Information regarding your policy** (e.g. client identification number, policy number, means of payment, guarantees, term, amount and discounts);
- **Data needed for risk assessment purposes** (e.g. geographical location, type of housing, information on insurable assets, use of an insured vehicle for work, driving licence);
- **Insurance claim data** (e.g. insurance claim history, including indemnities paid and expert reports, information on victims);
- **Data on your lifestyle and use of insured assets**
 - Data regarding your **lifestyle** (e.g. hobbies, sports and outdoor activities, number of kilometres covered);
 - Data concerning **your use of your insured assets relating to your policies** (e.g. main and secondary place of residence);
- **Data obtained from our interaction with you** (e.g. our website, our applications, our pages on social networks, meetings, calls, online chat, e-mails, interviews, phone calls, correspondence, requests for information or documentation, marketing);
- **Video surveillance** (including CCTV);
- **Location and geolocation data regarding persons or assets relating to the insured risks or proposed services** (e.g. to establish the location of insured vehicles for security reasons or to locate the nearest branch or service provider);
- **Connection and tracking data** (e.g. audit trail, time stamping, cookies, connection to client online services, user names used during participation in online studies, investigations and online surveys);
- **Data regarding your participation in competitions, prize draws and promotional activities** (e.g. participation date, your responses, your photo and the type of prize on offer);
- **Data needed to combat insurance fraud, money laundering and terrorist financing.**

Where necessary, and only upon obtaining your explicit consent, we may collect the following sensitive data, particularly:

- **Biometric data** (e.g. digital footprint, voice or facial recognition) which may be used for identification and security purposes;
- **Health information** (e.g. when taking out an insurance policy requires completion of a medical questionnaire);
- **Religious and philosophical beliefs** in order to draw up life insurance policies intended to cover funeral services. This data is processed only if it is strictly necessary.

We do not process any data relating to your ethnic origin, your political views, your philosophical beliefs, your trade union membership, your genetic data or data relating to your sexual orientation, unless required by law to do so.

The personal data that we use may be obtained from you directly or from the following sources with the aim of checking or supplementing our database:

- Publications/databases made available by official authorities;
- Our service providers;
- Third parties such as fraud prevention agencies or data brokers in accordance with data protection legislation;
- Websites/social network pages containing information you made public (e.g. your own website or social networks); and
- Databases made publicly available by third parties.

2. SPECIFIC CASES IN WHICH PERSONAL DATA IS COLLECTED DIRECTLY AND INDIRECTLY

In certain cases we may collect information about you without being in direct contact with you.

This may happen, for example, if your employer provides us with information about you or if your contact details are submitted to us by one of our client if, for example, you are:

- a beneficiary of an insurance policy;
- a family member (covered by a family insurance policy concluded by one of our clients);
- a co-borrower;
- a legal representative (power of attorney);
- an employee of one of our service providers/commercial partners.

3. WHY AND ON WHAT BASIS DO WE USE YOUR DATA?

3.1. TO COMPLY WITH OUR LEGAL AND REGULATORY OBLIGATIONS

We use your personal data in order to comply with various legal and regulatory obligations that we are obliged to adhere to, such as:

- Prevention of insurance fraud;
- Combating money laundering and terrorist financing;
- Combating tax fraud, carrying out tax audits and fulfilling notification obligations;
- Monitoring and reporting risks to which we may be exposed;
- Responding to official requests from a duly authorised public or judicial authority.

3.2. TO PERFORM A CONTRACT WITH YOU OR IN ORDER TO INTRODUCE MEASURES, AT YOUR REQUEST, PRIOR TO ENTERING INTO AN AGREEMENT

We use your personal data to enter into and perform our agreements, and in particular:

- To assess the risk characteristics for the purposes of determining the pricing;
- To manage complaints and the performance of contractual guarantees;
- To communicate information about our policies to you;
- To support you and respond to your requests;
- To assess whether we can offer you a policy and, where applicable, to set the conditions.

3.3. BECAUSE WE PURSUE A LEGITIMATE INTEREST

We use your personal data in order to expand and develop our policies, in order to improve our risk management, and in order to assert our rights, in particular:

- Proof that a premium or contribution has been paid;
- Fraud prevention;
- Managing disputes and recoveries proceedings;
- Management of information systems, including infrastructure management (e.g. shared platform), as well as business continuity and IT security;
- The creation of individual statistical models based on an analysis of the number and frequency of claims for the insurer, for example with the aim of defining your insurance risk score;
- The creation of aggregated statistics, tests and models for research and development, to improve the management of our risks or to improve existing products and services or to create new ones;
- The launch of our prevention campaigns, for example by creating alerts linked to the occurrence of natural disasters or weather events, in the event of delays on the roads, ice etc.;
- Raising awareness of our staff through recording of the calls made and received by our call centres;
- Tailoring of our offers to suit your requirements through:
 - Improvement in the quality of our policies;
 - Communication in relation to our policies based on your situation and your profile.
This may be achieved by:
 - Segmenting our prospective clients and our clients;
 - Analysing your habits and preferences with regard to the different channels of communication that we make available to you (e-mail or messaging, visiting our websites etc.); and
 - Matching the data relating to policies that you have already taken out or for which you have had a quotation, with other data that we hold about you (e.g. we can see that you have children but that you do not yet have any form of family insurance in place).
- Organisation of competitions, prize draws and promotional campaigns.

Your personal data may be combined with other anonymous statistics that may be submitted to BNP Paribas Group entities to help them develop their activity. In such a case your personal data will never be disclosed and the recipients of the anonymous statistical data will not be able to identify you.

3.4. TO RESPECT YOUR CHOICE, IF WE REQUESTED YOUR CONSENT FOR A SPECIFIC PROCESSING

In some circumstances we are required to request your consent before processing your personal data, for example:

- Unless we are able to refer to a different legal basis, when the above purposes result in automated decision-making, which produces legal effects or affects you to a significant extent. In such a case, we will inform you separately of the underlying logic, of the importance and of the intended consequences of this processing;
- If we are required to carry out subsequent processing for purposes other than those listed in section 3, we will inform you accordingly and, if necessary, obtain your consent.

4. WITH WHOM DO WE SHARE YOUR PERSONAL DATA?

In order to adhere to the purposes listed above, we will only share your personal data with the following individuals and entities:

- Our employees responsible for managing your policies;
- Our intermediaries and managers involved in the policy;
- The co-insurers, reinsurers and guarantee funds;
- Parties with an interest in the policy such as:
 - The policyholder, the subscriber, the insured parties and their representatives;
 - The policy assignees and subrogated parties;
 - The persons responsible for the claim, the victims, their representatives and the witnesses;
 - Custodian banks;
 - Financial managers.
- Social security organisations when involved in a claim for compensation or when we offer benefits to supplement social benefits;
- Our service providers;
- Our banking partners, our brokers, our commercial partners and the insurers with whom we have an ongoing business relationships;
- The financial and judicial authorities, arbitrators and mediators, public agencies and state agencies, upon request and to the extent permitted by law;
- Certain regulated professions such as healthcare professionals, lawyers, notaries, trustees and auditors.

5. DO WE TRANSFER PERSONAL DATA OUTSIDE OF THE EUROPEAN ECONOMIC AREA?

In the event of a transfer to a country outside the European Economic Area (EEA) but with a level of protection that the European Commission recognises as adequate, your personal data may be transferred on this basis. Such a transfer does not require any specific approval.

In the event of a transfer to a country outside the European Economic Area (EEA) that does not provide a level of protection that the European Commission recognises as adequate, we will either rely on a specific derogation for that situation (e.g. if the transfer is needed to perform the contract, such as an international payment) or implement safeguards to guarantee the protection of your personal data, such as:

- Standard contractual clauses approved by the European Commission and guaranteeing a level of protection of the data that is equivalent to an EEA country;
- Where applicable, binding corporate rules (for intra-Group transfers).

If you wish to familiarise yourself with these guarantees, please send a written request in accordance with the conditions stipulated in section 9 of this Notice.

6. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

The retention period is the term of your policy (or of the policy taken out by your company), to which is added the statutory limitation period for legal claims under the policy, unless overriding legal or regulatory provisions impose a longer or shorter retention period. Once this period has expired, your personal data will be deleted from our systems.

7. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

In accordance with the applicable rules and regulations, you have the following rights:

- **Right of access:** You may obtain information relating to the processing of your personal data, and a copy of that data.
- **Right of rectification:** If you believe that your personal data is inaccurate or incomplete, you may request that the data concerned be amended.
- **Right of erasure:** You may request the deletion of your personal data, to the extent permitted by law.
- **Right to restrict:** You may request that the processing of your personal data be limited.
- **Right of objection:** You may object to the processing of your personal data for reasons relating to your particular situation. You also have an absolute right of objection with regard to the processing of your personal data for commercial canvassing purposes, including profiling, to the extent that this is linked to such canvassing activity.
- **Right to withdraw your consent:** If you have given your consent to your personal data being processed, you may withdraw this consent at any time.
- **Right to data portability:** In certain circumstances, you have the right to take back personal data that you have supplied to us or, where this is technically possible, to request that the data be transferred to another data controller.

If you wish to exercise one of the rights referred to above, please contact, by post or e-mail:

1. First, the local correspondent of the Insurer who ensures the protection of personal data, by sending an e-mail to: group_assurance_lu_ldpo@cardifluxvie.lu, or by post to:

Cardif Lux Vie – LDPO – Délégué Local à la protection des données

23-25, avenue de la Porte-Neuve
L-2227 Luxembourg
Luxembourg

2. The Data Protection Officer (DPO) of BNP Paribas Cardif Group, by sending an email to: group_assurance_data_protection_office@bnpparibas.com, or by post to:

BNP Paribas CARDIF - DPO

8, rue du Port
92728 Nanterre
France

Please include a photocopy or scanned version of your ID document as proof of identity.

In accordance with the applicable regulations, and in addition to the rights listed above, you may also submit a complaint to the "Commission Nationale pour la Protection des Données" (CNPD), or any other competent authority.

8. HOW TO KEEP UP TO DATE WITH ANY CHANGES TO THIS DATA PROTECTION NOTICE

In a world of constant technological changes, we may be required to regularly update this Data Protection Notice.

We then invite you to consult the most recent version online, and we will inform you of any material changes to the Data Protection Notice through our website or through our usual channels of communication.

9. HOW TO CONTACT US

If you have any questions regarding the use of your personal data, please contact our data protection officer (DPO) using the following addresses:

1. First, the local correspondent of the Insurer who ensures the protection of personal data, by sending an e-mail to: group_assurance_lu_ldpo@cardifluxvie.lu, or by post to:

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