



INFORMATION NOTICE ON THE PROTECTION OF YOUR PERSONAL DATA AS WHISTLEBLOWER OR SUBJECT OF AN ALERT

AXA respects your privacy and ensures that all the personal data it handles is processed in accordance with best confidentiality practices and the applicable laws on data protection, and notably the European Union General Data Protection Regulation n°2016/679 (GDPR). The objective of this Information Notice is to inform you of the processing of your personal data that applies or may apply to you. If you face or witness serious breaches of the law, serious business risks or unlawful conduct, you can report them confidentially. Breaches of the Codes of Ethics and Professional Conduct are covered by this whistleblowing system.



The processing operations presented in this Information Notice are those carried out by AXA SA (the parent company) and GIE AXA only, without prejudice to the processing operations carried out by the AXA local entity (e.g., AXA France) with which you are in contact.

When you issue an alert, you (as the whistleblower) are informed and are aware that you should only transmit personal data necessary for the proper conduct of the investigation. In any case, only personal data necessary for the proper conduct of the investigation will be processed. Please note that only the following shall be included in the scope of the whistleblowing system:

- Criminal offence,
- Serious and manifest violation of an international commitment duly ratified or approved by France, of a unilateral act,
- Serious and manifest violation of an international organization taken based on such a commitment, of law or regulation, or a serious threat or harm to the general interest, when the facts in question are not covered by national defense secrecy, medical secrecy, or the secrecy of relations between a lawyer and his client, and,
- Violations of ethical rules adopted by AXA. For instance, the whistleblowing system is designed to receive alerts on serious breaches that apply to the financial, accounting, banking, and anti-corruption fields (CNIL 25, February 2010 N° 2010-047).

Moreover, please note that the person targeted by the alert may under no circumstances obtain communication of information concerning the identity of the issuer of the alert if there is a risk of seriously jeopardize the attainment of the objectives of the said processing (among these risks, the risk of destruction of evidence is identified by the CNIL. In not drawing up an exhaustive list of these risks, it is up to the data controller to assess these risks).



UPDATE OF THE PRESENT INFORMATION NOTICE ON THE PROTECTION OF YOUR PERSONAL DATA

The Data Controllers may update this Information Notice from time to time in response to changing legal, technical, or business developments. When the Data Controllers update this Information Notice, the Data Controllers will take appropriate measures to inform you, consistent with the significance of the changes the Data Controllers make. The Data Controllers will obtain your consent to any material Information Notice changes if and where this is required by applicable data protection laws. This Information Notice was last updated on August 30, 2023.

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WHO IS THE DATA CONTROLLER OF YOUR PERSONAL DATA?

Act as Independent Data Controllers in the context of the processing of Your personal data (i.e., they determine the purposes and means of the processing of your information):

GIE AXA, an economic interest grouping, organized under the laws of France, having its registered office at 23 Avenue Matignon, 75008 Paris, registered with the Registry of Commerce and Companies of Paris under number 333 491 066.

AND

AXA SA, a Société Anonyme, organized under the laws of France, having its registered office at 25 Avenue Matignon, 75008 Paris, registered with the Registry of Commerce and Companies of Paris under number 572 093920, excluding these subsidiaries.

The data controllers are referred to in this Information Notice as "AXA" or "Data Controllers" or "We" or "Us".



WHAT ARE YOUR RIGHTS TO YOUR PERSONAL DATA?

In accordance with the French "Informatique et Libertés" law n° 78-17 of 6 January 1978 and the GDPR, you have the right to:

- **Access to your personal data:** you have the right to request access to the personal data We process about you, and to obtain a copy of that data,
- **Rectify your personal data:** you have the right to ask AXA to rectify or complete the personal data that We process about you that are inaccurate, incomplete, or not up to date,
- **Request the limitation of the processing of your personal data:** you have the right to ask AXA to limit the processing of your personal data. This means that the Data Controllers may simply keep your data but may not process or use it in any other way,
- **Decide what happens to your personal data after your death:** you have the right to give AXA instructions as to how your personal data should be used after your death.

Based on the legal basis for the processing of your personal data described in the table below, you have also the right to:

- **Request the deletion of your personal data:** you have the right to ask AXA to delete your personal data, except where the processing is based on the performance of a legal obligation of the Data Controllers,
- **Right to object at any time, only where the processing of your data is based on the Data Controllers' legitimate interest(s)**, to the processing of your personal data, unless the Data Controllers can demonstrate the need for further processing or where such data is necessary for the establishment, exercise, or defense of legal claims. Furthermore, information on the balancing test can be obtained on request by contacting the following address: privacy@axa.com.



HOW TO CONTACT THE DPO OR EXERCISE YOUR RIGHTS?

If you have any questions, complaints, or comments regarding this Information Notice or to exercise your rights listed above, please contact the DPO. The contact details are as follows: (i) privacy@axa.com and / or (ii) 23 avenue Matignon, 75008, Paris for GIE AXA or 25 avenue Matignon, 75008, Paris for AXA SA.

The Data Controllers may ask you for additional information to confirm your identity and/or to assist AXA to locate the data you are seeking.



HOW TO MAKE A COMPLAINT TO A SUPERVISORY AUTHORITY?

You have the right to raise concerns about how your personal data is being processed with a competent supervisory authority, in particular in the Member State of your habitual residence, place of work or place where you think an alleged infringement to your rights occurred.

In France, the data protection authority is the Commission Nationale de l'Informatique et des Libertés, or "CNIL" whose postal address is 3 place de Fontenoy - TSA 80715 – 75334 Paris CEDEX 07. Its website is accessible here: <https://www.cnil.fr/>



HOW DO WE ENSURE THE SECURITY OF YOUR PERSONAL DATA?

The Data Controllers use appropriate technical and organizational measures designed to protect the personal information about you. The measures the Data Controllers use are designed to provide a level of security appropriate to the risk of the processing activity of your personal information, in line with AXA standards.



IS THE PROVISION OF YOUR PERSONAL DATA MANDATORY?

Whether or not the provision of your personal data to AXA is mandatory will be indicated to you at the time of collection of such data (e.g., by an asterisk on the collection form). If you do not provide AXA with data identified as mandatory, AXA may be unable to handle the alert.



FOR WHAT PURPOSES AND IN WHAT WAY IS YOUR PERSONAL DATA PROCESSED?

Your personal data is processed for the different purposes listed in the table below. You will also find in the table below, for each purpose, the relevant information relating to the processing of your personal data.

What is the purpose?	What is the legal basis?	What personal data do We process about you?	How long will your personal data be kept?
To collect and process alerts or reports to reveal inappropriate, unethical or illegal behavior or misconduct in the implementation of a whistleblowing system	A legal obligation, The processing of your sensitive data is based on CNIL guidelines on the processing of personal data for the implementation of a professional alert system.	Your identification data: first name, last name, internet profile and social networks, Your professional data: profession, position, professional email, Your connection data: proxies logs, Your sensitive data: Your health data: state of health, disabilities, etc., Your data relating to your beliefs and opinions: ethnic or alleged racial origin, political opinions, religious or philosophical beliefs or trade union membership, Your data relating to your sexual orientation, Your data relating to criminal convictions and offences: your criminal record history, for the strictly limited purpose of compliance with our legal and regulatory obligations due to Sapin 2 law	Your personal data is deleted at the expiry of the retention period defined in accordance with legal and regulatory requirements of AXA.
To collect and process alerts or reports to reveal inappropriate, unethical or illegal behavior or misconduct on social media in the implementation of a whistleblowing system	Our legitimate interests: as part of our fight against violence and corruption within the space of social networks and to collect any report of an existing or realized risk of behavior or situation contrary to our code of ethics, The processing of your sensitive personal data is based on CNIL guidelines on the processing of personal data for the implementation of a professional alert system.		



IS AN AUTOMATED DECISION MADE IN THE CONTEXT OF THIS PROCESSING?

No automated decision making is performed for processing described in this Information Notice.



WHERE DOES YOUR PERSONAL DATA COME FROM?

Most of the personal data that We process is collected directly from you, notably if you are the whistleblower.

In limited circumstances (e.g., you are the person subject to the alert or any third party), and subject to applicable data protection laws and regulations, your personal data are provided to us by a third-party, such as customers, prospects, job applicants, former employees, consultants or service providers, Internet users or any other third-party that We may use to check references.

In these cases of indirect data collection, you will be informed, within a reasonable time after obtaining such personal data, of:

- The categories of personal data concerned,
- The purposes of the processing of personal data and the legal basis of the processing activity,
- The recipients or categories of recipients, if applicable,
- The period for which such personal data will be kept or, if this is not possible, the criteria used to determine this retention period,
- From which source the personal data originate, and if applicable, whether it came from publicly accessible sources,
- The rights you have, as a data subject, regarding your personal data.

In any event, in accordance with applicable laws and principles, your personal data will be treated fairly and transparently, collected for specific, explicit, and legitimate purposes, and will not be further processed in a manner incompatible with those purposes. We will only process personal data that are adequate and relevant, limited to what is necessary for the purposes for which it is processed.



TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?

The Data Controllers communicate your personal data only to identified and authorized recipients which are the following:

Internal

Authorized recipients, within the limits of their respective attributions in relation to the relevant processing:

- **Investigation Group department of GIE AXA**, for the purpose of monitoring the relevance of alerts and carrying out investigations. The categories of personal data transferred are your identification data, your professional data, potentially your sensitive data and your infraction data,
- **GIE AXA Human Resources Group, Legal Group and Compliance Group departments**, for the purpose of following up possible legal proceedings/actions in the courts. The categories of personal data transferred are your identification data, your professional data, potentially your sensitive data and your infraction data.
- **GIE AXA Group Audit department**, for the purpose of performing internal audits to ensure the adequacy and effectiveness of internal controls and governance. For this processing, We pursue our legitimate interests to ensure a prudent and transparent management of the company through the evaluation of the adequacy and effectiveness of the internal control activities. Where relevant, this may include checking controls over transactions or records containing personal data. The processing of your sensitive data is based on your consent, collected by GIE AXA or other AXA entities (e.g., AXA France) with which you are in contact. Any personal data required to support the audit conclusion is deleted ten (10) years after the closing of the last issue relating to the audit (or after the issuance of the audit report if no issues have been identified), all other personal data is deleted within ten (10) days following completion of the audit.
- **Group Risk Management and Group Compliance Departments of GIE AXA**, to perform or support local AXA entities in performing the due diligence required to comply with AXA Standards and to document compliance with these Standards through an in-depth review. These departments may be called upon to give a second opinion on a particular case at the request of a local AXA entity and based on data provided by that entity. Your personal data will be kept for a maximum of five (5) years after the end of your employment contract.
 - The legal basis for the processing carried out by the **Group Risk Management department** is legitimate interest, to ensure compliance with the Standards resulting from Solvency II regulations and issued by the Autorité de contrôle prudentiel et de résolution (ACPR),
 - The legal basis for the processing carried out by **Group Compliance department** is the AXA Group's legal obligation to comply with the requirements of the French Monetary and Financial Code,

For the reasons mentioned in the table above (purposes), your personal data may be communicated by email between the departments mentioned above. Please note that this information is archived for one (1) year before being permanently deleted:

- Information contained in a deleted email (i.e., moved to the "deleted items" category of the mailbox from the date on which the email is deleted),
- Information contained in the mailbox of an employee or consultant who has left GIE AXA / AXA SA / GIE AXA Université (from the date of his or her departure).

External

Acting as independent data controllers, (i.e., these recipients determine the purposes and means of processing):

- Our counsel, including our lawyers, insurers, reinsurers, brokers, auditors,
- Any competent authority (including courts, judicial or administrative authorities, ACPR, French tax authorities),
- Any potential buyer or partner, in the case that the Data Controllers take part in a merger, acquisition or other form of asset transfer, they undertake to ensure an adequate level of protection if your personal data is transferred to potential buyers or selected partners in the context of this transaction.



For all these stakeholders, please refer to their own privacy policy.



IS YOUR PERSONAL DATA TRANSFERRED OUTSIDE THE EUROPEAN UNION?

These recipients are located within the European Union (EU).